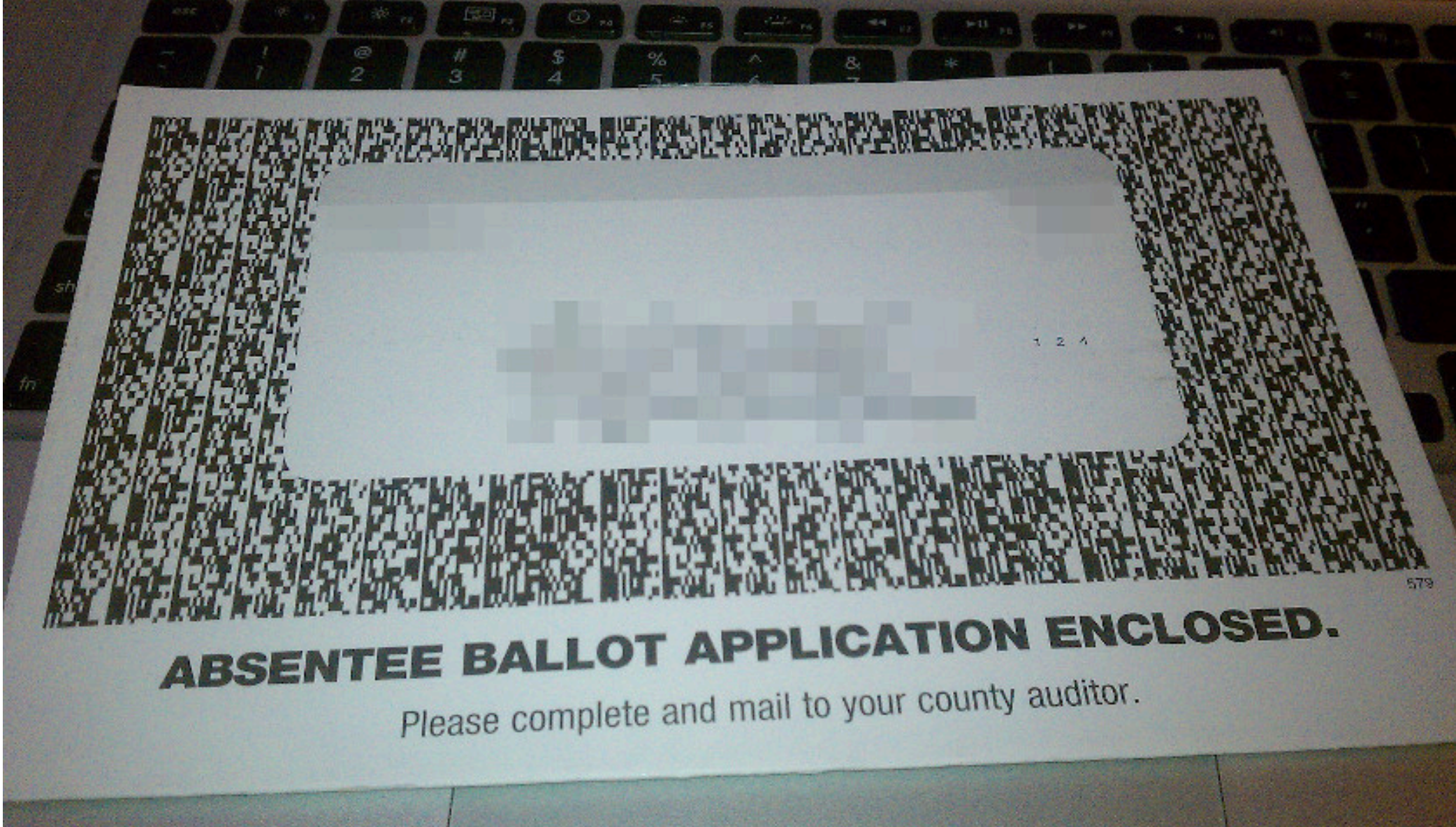


# Exhibit A



DeKalb County Voter Says Her Address Was Changed and an Absentee Ballot Requested to Steal Her Vote

October 6, 2021 Laura Baigert



In a case of what she says could be for no other purpose than vote stealing, a DeKalb County voter had her address changed and an absentee ballot requested for the November 3, 2020, presidential election, telling her story to **The Georgia Star News** exclusively in order to share the information with the public.

"Please get this information out – it is very important," Mary Williams Benefield told **The Star News**.

Benefield is a lifelong DeKalb County resident who has lived at the same house for the past 10 years and voted in at least three election cycles while living at that address.

A registered voter since 1992, when Benefield went to cast her vote during early voting at her voting precinct for the November 3, 2020, general election, she was informed that she had requested an absentee ballot.

To that, Benefield says, "I absolutely DID NOT."

But, because the absentee ballot was on record as having been requested, Benefield was only able to cast her vote via a provisional ballot. She also signed an affidavit attached to a clipboard, attesting to the fact that she had not requested an absentee ballot. Benefield told **The Star News** that she was one of "MANY" she saw who went through the same process.

When Benefield returned home, she went to the **MyVoter page** on the Georgia secretary of state's website. While on the website, she discovered that her address had been changed from her house in Tucker, Georgia to an apartment also in the same town.

"I had not moved, I had not changed my address," and Benefield added a disturbing point, "I had NO knowledge that any record of mine had been altered in any way."

Benefield said the only change relative to voting that she was aware of was a notice she received in July 2019 that her polling location changed from Cofer Library to Wesley Center. Benefield supplied **The Star News** with a copy of the new polling location notification from DeKalb County's Voter Registration Office postmarked "07 Jun 2019" adjacent to the way her voting record appeared with the incorrect address.

[wonderplugin\_pdf src="https://tennesseestar.com/wp-content/uploads/2021/10/1-SOS-My-Voter-Page-and-Polling-Place-Notification-Redacted.pdf" width="650" height="866px" style="border:0;"]

As she explains it, on November 20, 2020, Benefield went to the voter registration office on Memorial Drive to correct her address.

It was a process that not only took three hours, but was also a less than satisfactory customer service experience for Benefield.

Benefield was told that her address was changed in August 2020 by someone who mailed in a change of address and that identification was provided in order for the change to be made.

Benefield asked to see the identification, recognizing that whatever had been presented would had to have been fraudulent.

Unfortunately, Benefield was told she could not see the identification that was presented to affect the address change to her voter information, because it is a matter of voter privacy.

Interestingly, though, Benefield herself was required to fill out a State of Georgia Application for Voter Registration form, which has among its options a change of address.

Benefield filled out the form and told **The Star News** that she also had to present her driver's license as a form of photo identification as well as a utility bill, which is a stated "Requirement" printed in the middle of the registration form.

[wonderplugin\_pdf src="https://tennesseestar.com/wp-content/uploads/2021/10/3-Change-of-Address-Form-Redacted.pdf" width="650" height="866px" style="border:0;"]

This does not seem to be the process that was followed for the change of address to Benefield's voter registration made on August 20, 2020. Benefield's electronic voter registration record, a copy of which Benefield printed and provided to **The Star News**, states in the Memo section, "spoke with voter, addr changed per absentee application."

[wonderplugin\_pdf src="https://tennesseestar.com/wp-content/uploads/2021/10/2-Voter-Registration-History-Mary-Williams-Benefield-Redacted.pdf" width="650" height="866px" style="border:0;"]

Benefield pushed the issue with the DeKalb County elections supervisor so that, while she waited, her address was corrected in the system and an updated precinct card was printed that reflected her correct address.

Even though Secretary of State Brad Raffensperger took it upon himself without Georgia General Assembly approval to **mail absentee ballot applications** for the November 3, 2020, general election to Georgia's 6.9 million voters, Benefield told **The Star News** she received several actual absentee ballots in the mail.

While Benefield said she probably received seven absentee ballots herself, between the four voting age adults living in the home, a total of about 25 absentee ballots for the November 3, 2020, general election were received in the mail.

Benefield was also contacted via text message by someone who identified themselves as being with an organization called Black Voters Matter. The **organization** is a 501(c)4 that registered in East Point, Georgia in August 2016 that's stated goal is "to increase power in marginalized, predominantly Black communities."

[wonderplugin\_pdf src="https://tennesseestar.com/wp-content/uploads/2021/10/4-Text-Message.pdf" width="650" height="866px" style="border:0;"]

The representative advised Benefield in the text that the organization looked at the public records and found that Benefield "may not have requested a mail ballot for the crucial run off elections on Jan 5th."

Benefield was asked, "Would you like your ballot mailed to you?"

"NO. I vote in person. Do not contact me again," was Benefield's response.

In discussion with **The Star News**, Benefield questioned how a third party could be in a position to execute on getting her an absentee ballot and why anyone would even want to go through a third party when it comes to their vote.

Benefield was never advised by DeKalb County elections officials what happened to the provisional ballot she voted on for the November 3, 2020, general election.

According to a **form** posted on the DeKalb County Voter Registration and Elections webpage as one of many **documents** to be used by poll workers, the status of provisional ballots is to be recorded.

[wonderplugin\_pdf src="https://tennesseestar.com/wp-content/uploads/2021/10/Provisional-Numbered-List-of-Voters.pdf" width="650" height="866px" style="border:0;"]

The four-part form documents with a sequential number the name of the voter and time their vote provisional was cast for each voting day at every voting precinct.

The poll worker must document a code from a pre-assigned list of seven options as to the reason that a provisional vote was cast. Of note is that not one of the seven reasons addresses that an absentee ballot was requested by the voter.

Additionally, there is a section on the form reserved for the use of the registrar's office. In that section, the registrar is to mark with a check whether the voter's provisional ballot was either accepted or rejected. Within three business days after the election, the registrar must place the appropriate checkmark and return the original form to the election superintendent while a copy is retained by the registrar and one sent to the secretary of state as well as the clerk of superior court or the city clerk.

It is not clear whether voters other than Benefield ever learned from DeKalb County's registrar or election superintendent whether their vote was accepted or rejected.

It is obvious that, in addition to notifying the state Republican party of her experience, Benefield has been reflecting on this situation for some time. She told **The Star News** that what happened to her was a clear case of stealing her vote.

She even went so far as to say that it could not be a case of stolen identity because there were no issues with her credit cards, bank accounts or anything else associated with identity theft.

"Only my vote," Benefield said about what was stolen.

"There was no other justification for it," Benefield concluded about the change of address and the subsequent request for an absentee ballot.

Convinced that she is not the only one in DeKalb County that this situation happened to Benefield wanted to get her story out in hopes that others would come forward.

"DeKalb County is every bit as crooked as Fulton County. Are we surprised by this? No. I'm not the only one in DeKalb County this happened to," Benefield told **The Star News**.

Effective September 9, DeKalb County Elections Director Erica Hamilton was placed on an **extended leave of absence**. While DeKalb County elections officials won't tell voters and taxpayers whether the leave is related to her job performance and whether it is paid or unpaid, Raffensperger said during an interview with CNN that Hamilton's leave was the result of an investigation that came after **The Star News** reported that 43,000 absentee ballots DeKalb County counted in the November 2020 election violated chain of custody rules.

-- --

Laura Baigert is a senior reporter at **The Star News Network**, where she covers stories for **The Georgia Star News** and **The Tennessee Star**.  
Photo "Absentee Ballot Application Enclosed" by Tony Webster. CC BY 2.0.



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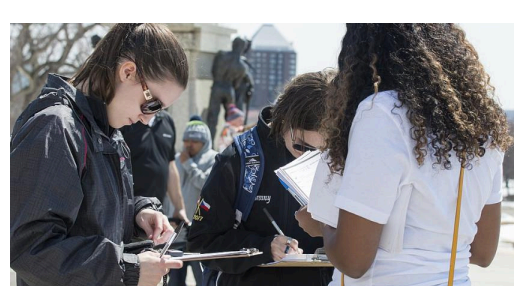
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24	25	26	27	28	29	30
31						
« Sep Nov »						



# Exhibit B



## Question re absentee ballots

3 messages

**CP Deborah Davis** <davis980519@gmail.com>

Thu, Aug 22, 2024 at 2:51 PM

To: Anne business hrs Dover <adover@cherokeega.com>

Bcc: Ann O'Mara <anny722@aol.com>, Beth Mercure <beth.mercure@raydeo.com>, CP Ricardo Davis <ricardodavis@gaconstitutionparty.org>, CP GARLAND FAVORITO <elections@gaconstitutionparty.org>

Anne,

I wanted to give you a chance to address this before I file a complaint with the State Board of Elections. I am finding in 21-2-381 (b)(2)(A) and 21-2-383(a) that absentee ballots are supposed to come to and be mailed by the absentee ballot clerk. Can you provide any authority that allows a vendor to do this outside the law?

Also I had sent an email asking if Dominion representatives would be administering the election since Bradley left. You may have been on vacation but I am not aware of receiving an answer on that.

Thanks

Deborah Davis

**Ann O'Mara** <anny722@aol.com>

Thu, Aug 22, 2024 at 4:55 PM

To: CP Deborah Davis <davis980519@gmail.com>

Interesting

Sent from my iPhone

> On Aug 22, 2024, at 2:51 PM, CP Deborah Davis <davis980519@gmail.com> wrote:

>

>

[Quoted text hidden]

**CP Deborah Davis** <davis980519@gmail.com>

Thu, Aug 22, 2024 at 5:01 PM

To: anny722@aol.com

Aint heard back from Anne Dover. I gave her a chance. I also did ORR to SOS. I never gave anybody permission to distribute my information to vendors. I promise you I didnt get my first primary ballot because the New York vendor just let it sit around. It didnt have postage, a postmark, or permit on it. How does something get in the mail system without postage?

[Quoted text hidden]





## Info

2 messages

**Anne Dover** <adover@cherokeecountyga.gov>  
To: Deborah Davis <davis980519@gmail.com>

Fri, Aug 23, 2024 at 6:52 PM

Hi Deb,  
Hope you are well.

Consistent with our practice beginning in the 2020 election, and consistent with the practice of numerous other counties, we have outsourced the mailing of the absentee ballots to a vendor with a proven track record. We do all the verification in house and then send the list to the vendor. The vendor does not work out of the elections office and has no access to the elections records or software. The Code does not prohibit us from delegating this and we have found that using a vendor saves our office time, money, resources of staff, and space. To mail the absentee ballots from our office would take space, manpower, and time that we do not have in our present facilities and under our present budget. We have never had a complaint from a person requesting an absentee ballot regarding the vendor.

Grace Waddell will be taking over all of Bradley's former duties.

Get [Outlook for iOS](#)

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**CP Deborah Davis** <davis980519@gmail.com>  
To: Anne Dover <adover@cherokeecountyga.gov>

Mon, Aug 26, 2024 at 12:17 PM

Bcc: CP Ricardo Davis <ricardodavis@gaconstitutionparty.org>, Ann O'Mara <anny722@aol.com>, Beth Mercure <beth.mercure@raydeo.com>, CP GARLAND FAVORITO <elections@gaconstitutionparty.org>, David Oles <oles.david@outlook.com>

Thanks. I am still not doing much good and cant do much. I am my own oxymoron.

The laws require ballot clerks to do it. Law says the ballots shall be delivered to the ballot clerk and they shall process and mail them. The shall for the ballot clerks to do it is the legislature restricting who and how it has to be done. I dont see any authorization for the absentee ballot clerk not to do it. There is a lot I dont know so I was wondering under what authority its sent to vendors. My absentee ballot is what I addressed at Aug election board meeting. (Attached) The vendors havent taken any kind of oath. That is worrisome. I dont know that Georgia has the authority to require an oath of printer employees or to enforce anything. A label with "Rep" (or "Dem") on it which both of mine had for the primary subjects ballots to mishandling. I was just thinking today the times my ballot has been delayed are when I was in the plan to get automatic absentee ballots. I wondered if I can get out of that in 2028 and just request it myself each voting. You will see the discrepancy regarding Ballottrax and Fort Orange dates in my talking points. Also on the return envelope the return address has REPUBLICAN spelled out and does not even require a guess what REP means to any bad actors. I hand deliver mine so I was not harmed by that but others could be/been. All lsbel had my voter registration number so that I think on the MVP web site it could be used to change voter information and on the new SOS site to advise moved that has already been hacked. That could cause a lot of provisional votes not to mention any fraudulent ballots not still in the envelopes would be counted. No party or voter registration numbers should be on an envelope easily readable.

You are not getting what you pay for with either vendor and lose control of the process. The irony is that since 2021 I have been told you have to go by the law and absent some authority that supercedes law that I dont know in this the law is not being followed.

Re IT for the election, Bradley had previously said we didnt need Dominion because he was able to do it. Unless Grace can do all that Bradley could since Dominion wont allow independent contractors I cant see anything to be done but have Dominion do it.

Thanks

Deborah Davis



# Exhibit C



David A. Cross  
4805 Spring Park Circle  
Suwanee, GA 30024  
678-925-6983  
dcross108@protonmail.com

March 3, 2022

Georgia State Election Board  
2 MLK Jr. Drive  
Suite 802 Floyd West Tower  
Atlanta, Georgia 30334

Mr. Brad Raffensperger  
Secretary of State  
214 State Capitol  
Atlanta, Georgia 30334  
[brad@sos.ga.gov](mailto:brad@sos.ga.gov)

RE: OFFICIAL COMPLAINT

Ladies and Gentlemen:

I am part of a volunteer team of citizens investigating irregularities in the contested November 2020 General Election. I am writing to file a complaint regarding the Fulton County, Wolf Creek Precinct and improper tabulation of early voting results. As a remedy, I am asking for permission to view the Advance Voting and Election Day ballots for the November 3, 2020, election because of irregularities like the one related to Wolf Creek that I will explain below.

## WOLF CREEK LIBRARY ICP3

Serial No. AAFAJKL0061

Early Voting

The image displays two side-by-side printer output tapes from a ballot tabulator. The left tape is titled 'Open/Zero Tape' and the right is titled 'Close Tape'. Both tapes contain identical information up to the 'Report Printed' line, which shows the date 'Oct 12/2020 05:42:28'. Below this, the 'Open/Zero Tape' shows 'Total Scanned: 0' and 'Total Voters: 0'. The 'Close Tape' shows 'Total Scanned: 3286' and 'Total Voters: 3286'. Two red arrows originate from the 'Total Scanned' and 'Total Voters' lines of the 'Open/Zero Tape' and point to the corresponding lines on the 'Close Tape', highlighting the discrepancy between the two reports.

Field	Open/Zero Tape	Close Tape
Tabulator ID	326	326
Voting Location	AV-Wolf Creek Library	AV-Wolf Creek Library
Report Printed	Oct 12/2020 05:42:28	Oct 12/2020 05:42:28
Unit Model	PCOS-320C (Rev 1072)	PCOS-320C (Rev 1072)
Unit Serial	AAFAJKL0061	AAFAJKL0061
Protective Counter	421	421
Software Version	5.5.3-0002	5.5.3-0002
Total Scanned	0	3286
Total Voters	0	3286



There are 2 tabulator tapes above for Wolf Creek Library – Tabulator ID 326. The tape on the left is referred to as a “Zero Tape”. The zero tape has 0’s at the bottom to reflect that no ballots are stored in the memory. The protective counter reads as 421, meaning that this tabulator has counted a total of 421 ballots in its lifetime – like an odometer on your car showing 421 miles have been driven with the vehicle.

The tape on the right is the closing tape, which was printed out on November 3, 2020, at 11:31 pm (military time on the tape is 23:31:14). As you can see, the total votes scanned is 3,286 however, the protective counter reads 929. These numbers are not possible. You cannot scan 3,286 ballots and have a protective counter reading of 929. That’s like saying you drove from Atlanta to Nome, Alaska but your odometer only reads 929 miles. Take a closer look below:

**Close Tape**

Tabulator Name	
AV-Wolf Creek Library ICP 3	
Tabulator ID	
326	
Voting Location	
AV-Wolf Creek Library	
-----	
Poll Opened	Oct 12/2020 05:49:55
Poll Closed	Nov 03/2020 23:31:14
Report Printed	Nov 03/2020 23:34:15
-----	
Unit Model: PCOS-320C (Rev 1072)	
Unit Serial:	AAFAJJY0174
Protective Counter:	929
Software Version:	5.5 3-0002
-----	
Total Scanned:	3286
Total Voters:	3286

When you view the tapes side-by-side you will notice that the Unit Serial numbers do not match. A possible explanation for this may be that the memory card was removed from the actual counter and installed in another machine to print the tape - a violation of election procedures and election law.

Because of this violation, it is not logical to assume that the vote count is authentic and for this reason, I respectfully ask to view the original advance voting and Election Day



ballots for the November 2020 General Election.

According to O.C.G.A. §21-2-499 (2019) in the event an error is found in the certified returns, presented to the Secretary of State or in the tabulation, computation, or canvassing of votes as described in this Code section, the Secretary of State shall notify the county submitting the incorrect returns and direct the county to correct and recertify such returns.

If the board is not willing to allow me to view the advance voting and Election Day ballots, you can simply decertify all the ballots cast on that machine and the others we have found with this same issue on the opening and closing tapes.

If you have questions or you would like to discuss this matter, please feel free to call me or have your investigators contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "David A. Cross". The signature is fluid and cursive, with a long horizontal stroke at the end.

David A. Cross

cc: Governor Brian Kemp  
206 Washington Street, Ste 203  
State Capitol  
Atlanta, GA 30334



David A. Cross  
4805 Spring Park Circle  
Suwanee, GA 30024  
678-925-6983  
dcross108@protonmail.com

April 7, 2022

Investigator Paul Cain #19  
Georgia Secretary of State's Office  
Investigator II  
2 MLK Jr. Drive SE  
Suite 802 West Tower  
Atlanta, Georgia 30334

RE: Document request for Unsigned Tabulator Tapes

Dear Paul,

Attached you will find the documents that you requested for my complaint:

1. Please provide a detailed *notarized* email statement in chronological order regarding your complaint.
2. Please provide certified copies of your open records requests to the Fulton County Board of Registration & Elections.
3. Please provide a certified copy of any emails, correspondence, and documents sent to you and received by you, from the Fulton County Board of Registration & Elections.

Sincerely,



David A. Cross

1. Please provide a detailed *notarized* email statement in chronological order regarding your complaint.

Summer 2021: Our investigation of Fulton County has taken us in a number of directions. During the summer of 2021, our team of volunteer citizens produced documents related to the risk limiting audit and the numerous errors that in that document.

Fall 2021: Our team began gathering additional documents through open records requests and we noticed a pattern emerging where processes and procedures were not followed by Fulton County and other counties.

Winter 2021: Late last year, in early December, we requested documents from Fulton County including tabulator tapes for closing out Election Day voting and Advance Voting. Documents were supplied to us by Fulton County and were certified by Fulton County's attorney, Mr. Steven Rosenberg. (see attached)

When we received the documents, it took us quite some time to assimilate because documents were upside down and compressed to single pages. I have provided you a link by email to the 77 megabytes of files that we received from Fulton County through Steven Rosenberg.

January 2022: We noticed that the vast majority of Advance Voting tabulator tapes were not signed by anyone. We also noticed that quite a number of the tapes have duplicated serial numbers as evidenced by the serial number at the top of the tape and the fact that the protective counter number is exactly the same even though the polling location is different. Several examples are in the original complaint.

March 2022: We filed our complaint with the State Election Board.

I, David Cross do hereby certify and declare that the attached request and responses to Investigator Cain regarding my complaint that Fulton County has a very large number of Unsigned Tabulator tapes for the November 2020 General Election is true and correct.

 4/7/2022  
\_\_\_\_\_  
Sworn Statement of David Cross

Karen M Karl  
NOTARY PUBLIC  
Gwinnett County, GEORGIA  
My Commission Expires 06/29/2025

  
4/7/22



2. Please provide certified copies of your open records requests to the Fulton County Board of Registration & Elections. – attached
3. Please provide a certified copy of any emails, correspondence, and documents sent to you and received by you, from the Fulton County Board of Registration & Elections. I don't recall any correspondence with the Fulton County BRE


Karen M Karl  
NOTARY PUBLIC  
Gwinnett County, GEORGIA  
My Commission Expires 06/29/2025

*Karen M Karl*  
4/7/22

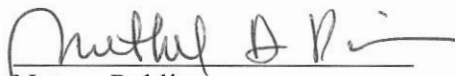
*Daniel A. Q*

**CERTIFICATION OF RECORDS**

I, **Steven Rosenberg**, as Open Records Custodian in the Office of the Fulton County Attorney, do hereby certify and declare that the attached request and responses to Request Reference # R008635-120121 seeking *all Tabulator Poll Tapes for the 11/3/2020 General Election, including those used for advanced voting and Logic and Accuracy Testing* are true and correct copies and are maintained in the normal course of Fulton County business.



Sworn to and subscribed  
Before me, this 22nd  
day of March, 2022.



Notary Public

My Commission Expires:





✉ On 1/2/2022 1:23:06 PM, Fulton County, Georgia wrote:

**Subject:** [Records Center] Open Records Request :: R008635-120121

**Body:**

January 02, 2022

**SENT VIA EMAIL:**

Dear Kevin Moncla:

This correspondence is in response to your Open Records Act Request Reference#: R008635-120121 dated December 01, 2021. Your request sought the following:

*Please provide all Tabulator Poll Tapes for the 11/3 2020 General Election, advanced voting.*

After reviewing the aforementioned request, we have identified responsive records. Records that were previously discussed are available electronically, you will not be charged.

Fulton County has uploaded the response records to your request to the portal. You can log into the system at [Open Records Center](#).

Please feel free to contact me at if you have any questions.

Sincerely,

Mariska Bodison  
Registration & Elections

xc: Steven E. Rosenberg, Open Records Custodian  
Shana Eatmon, Legal Assistant  
Unique McCray, Administrator Coordinator II

↩ On 12/14/2021 5:58:55 PM, Kevin Moncla wrote:

Please provide the advanced polling tapes that you referenced were provided for a previous request.

✉ On 12/8/2021 11:30:19 AM, Fulton County, Georgia wrote:

**Subject:** [Records Center] Open Records Request :: R008635-120121

**Body:**

December 08, 2021

**SENT VIA EMAIL:**

Dear Kevin Moncla:

This correspondence is in response to your Open Records Act Request Reference#: R008635-120121 dated December 01, 2021. Your request sought the following:

*Please provide all Tabulator Poll Tapes for the 11/3 2020 General Election, including those used for advanced voting and Logic and Accuracy Testing.*

After reviewing the aforementioned request, we believe we may have responsive records. As permitted by O.C.G.A. § 50-18-71(c), a fee will be charged to cover the administrative costs associated with the time spent searching for, retrieving, redacting, and supervising access to the requested documents. The fee represents the hourly rate of the lowest paid full-time employee(s) with the necessary skill and training to respond to your request. However, no charge will be made for the first fifteen minutes of staff time expended in complying with your request. Unless otherwise provided by law, the charge for copies is generally \$0.10 per page, as permitted by O.C.G.A. § 50-18-71(c).

Because this amount is in excess of \$500, we will delay producing said records until such time as you pay the estimated costs. You may do so forwarding a check, payable to Fulton County, to the attention of Steven Rosenberg, at the address above. The estimated cost for search, retrieval, and copying of the responsive records is \$15,800.00. This amount includes the following fees listed below:

Advanced voting poll tapes was done for a previous request and these will be uploaded as soon as they are located.

L&A Testing polls tapes will be at a cost for personnel for completions.

7 Personnel for completion  
14-21 business days.

It is anticipated that responsive records can be made available by December 08, 2021.

Finally, please be advised that certain requested documents, or portions thereof, have been redacted pursuant to the Georgia Open Records Act. Specifically, the following records may be exempted or redacted:

Please feel free to contact me at if you have any questions.  
Sincerely,

Mariska Bodison  
Registration & Elections

xc: Steven E. Rosenberg, Open Records Custodian  
Shana Eatmon, Legal Assistant  
Unique McCray, Administrative Coordinator II



← On 12/7/2021 2:09:01 PM, Kevin Moncla wrote:

TO: "Fulton County Georgia"[fultoncountyga@mycusthelp.net]

Thank you Shana

On Tue, Dec 7, 2021 at 12:56 PM Fulton County Georgia wrote:

✉ On 12/7/2021 1:55:49 PM, Fulton County, Georgia wrote:

**Subject:** [Records Center] Open Records Request :: R008635-120121

**Body:**



December 07, 2021

**SENT VIA EMAIL:**

Dear Requester Moncla:

This correspondence is in response to your Open Records Act Request Reference#: R008635-120121 dated December 01, 2021. Your request sought the following:


*Please provide all Tabulator Poll Tapes for the 11/3 2020 General Election, including those used for advanced voting and Logic and Accuracy Testing.*

Fulton County is in receipt of your request for records. We are currently in the process of locating responsive records to the extent they exist. We believe we can provide you with the same by Wednesday, December 8th. Thank you for your consideration.

Sincerely,

Shana Eatmon  
Legal Assistant

xc: Steven E. Rosenberg, Open Records Custodian

 On 12/1/2021 4:19:21 AM, Fulton County, Georgia wrote:

Dear Kevin Moncla:

Thank you for submitting an Open Records Request to Fulton County, Georgia.

The County received your Open Records Act request dated December 01, 2021 and has assigned the reference number R008635-120121 for tracking purposes.

Record(s) Requested: *Please provide all Tabulator Poll Tapes for the 11/3 2020 General Election, including those used for advanced voting and Logic and Accuracy Testing.*

We will send out the request to the appropriate department(s). If you should have any questions or concerns about the requested documents, please feel free to contact the Fulton County Open Records team. If there should be a cost associated with the Open Records Request we will contact you in a timely manner.

Fulton County has a new Open Records Center that allows you to submit and track Open Records Act requests. Please visit the link below to monitor request progress and submit future requests.

[Open Records Center](#)

Fulton County Open Records

 On 12/1/2021 4:19:20 AM, Kevin Moncla wrote:

Request Created on Public Portal



David Cross  
4805 Spring Park Circle  
Suwanee, GA 30024

Kevin Moncla  
824 Lake Grove Drive  
Little Elm, TX 75068

Joseph Rossi  
2007 Cedar Ridge Drive  
Perry, GA 31069

September 27, 2022

Georgia State Election Board  
2 MLK Jr. Drive  
Suite 802 Floyd West Tower  
Atlanta, Georgia 30334

Dr. Jan Johnston  
JJohnstonMD.seb@gmail.com

Sarah Ghazal  
saraghazal.seb@gmail.com

Judge William Duffey, Jr.  
wduffey.seb@gmail.com

Mr. Edward Lindsey  
edwardlindsey.seb@gmail.com

Matthew Mashburn  
mmashburn.seb@gmail.com

RE: OFFICIAL COMPLAINT – Statewide Precinct Scanner Failures

Your Honor, Ladies and Gentlemen:

We are part of a volunteer team called The Election Oversight Group investigating irregularities in Georgia Elections. We are writing to file an **URGENT COMPLAINT regarding a technical failure identified by the United States Election Assistance Commission (EAC) that affect Dominion precinct scanners in Georgia causing the machines to miscount votes.**

We discovered an error that affects the functioning of Georgia's Dominion precinct level scanners/tabulators. The error causes the devices to undercount votes. The number of undercounted votes is impossible to determine without reconciling the paper ballots against a scanner's digital results. The United States Election Assistance Commission (EAC) in March 2022 first reported the error in Williamson County, Tennessee and fully documented in their report which is attached to this letter. In their report, they stated:

“Analysis of audit log information revealed entries that coincided with the manifestation of the anomaly; a security error “QR code signature mismatch” and a warning message “Ballot format or id is unrecognizable” indicating a QR code misread occurred. When these events were logged, the ballot was rejected. Subsequent resetting of the ICP scanners and additional tabulation demonstrated that each instance of the anomaly coincided with the previously mentioned audit log entries, though not every instance of those audit log entries resulted in the anomaly.

Further analysis of the anomaly behavior showed that the scanners correctly tabulated all ballots until the anomaly was triggered. Following the anomaly, ballots successfully scanned and tabulated by the ICP were not reflected in the close poll reports on the affected ICP scanners.”

The EAC report went on to conclude that the cause was inconclusive and that the poll results were incorrect.

### **Conclusion of Formal Investigation**

The direct cause of the anomaly was inconclusive. Based on the investigation, it’s reasonable to conclude that the anomaly is related to the imported D-Suite 5.5 election definition used on the D-Suite 5.5-B system.

On February 11, 2022, Dominion submitted a Root Cause Analysis (RCA) to the EAC. The report indicates that erroneous code is present in the EAC certified D-Suite 5.5-B and D-Suite 5.5-C systems. The RCA report states that when the anomaly occurs, it’s due to a misread of the QR code. If the QR code misread affects a certain part of the QR code, the ICP scanner mistakenly interprets a bit in the code that marks the ballot as provisional. Once that misread happens, the provisional flag is not properly reset after that ballot’s voting session. The result is that every ballot scanned and tabulated by the machine after that misread is marked as provisional and thus, not included in the tabulator’s close poll report totals.

---

We asked Jonathon Panek, the EAC author of the Williamson County Tennessee report, if the EAC found the anomaly in any other areas of the country. He replied:

August 8, 2022

Hello David,

The EAC received one report of the issue occurring. As part of the investigation process, the issue was communicated out to all affected jurisdictions. No additional reports were received.

**Jonathon Panek** | Director, Testing and Certification  
U.S. Election Assistance Commission  
633 3<sup>rd</sup> Street NW, Suite 200 | Washington, DC 20001  
[www.eac.gov](http://www.eac.gov)

Our group then placed open records requests for all 159 counties in Georgia to determine if the same error found in Williamson County Tennessee was present in Georgia. After being unlawfully blocked and significantly delayed by the Secretary of State's office, we were able to obtain data files from 66 of 159 Georgia counties. So far, 64 of 66 counties (97%) have **precinct scanners exhibiting the same error reported by the EAC in Williamson County Tennessee that still has no known cause or resolution.** See attached system log (SLOG) file pages from the counties who complied with our Open Records Requests.



See a sample page from each county with the error: <https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:56359f90-2488-3111-9a72-5f77456db381>

County	ICPs receive	Errors?	County	ICPs receive	Errors?
Atkinson County	YES	YES	Fayette County	YES	YES
Bacon County	YES	YES	Forsyth County	YES	YES
Banks County	YES	YES	Fulton County	YES	YES
Barrow County	YES	YES	Gordon County	YES	YES
Bartow County	YES	YES	Gwinnett County	YES	YES
Ben Hill County	YES	YES	Hall County	YES	YES
Berrien County	YES	YES	Hart County	YES	YES
Bibb County	YES	YES	Heard County	YES	YES
Bleckley County	YES	YES	Irwin County	YES	YES
Brantley County	YES	YES	Jasper County	YES	YES
Bryan County	YES	YES	Jenkins County	YES	YES
Bulloch County	YES	YES	Lamar County	YES	YES
Burke County	YES	YES	Lumpkin County	YES	YES
Butts County	YES	YES	Madison County	YES	YES
Calhoun County	YES	YES	McDuffie County	YES	YES
Camden County	YES	YES	Mitchell County	YES	YES
Candler County	YES	YES	Morgan County	YES	YES
Carroll County	YES	YES	Newton County	YES	YES
Catoosa County	YES	YES	Oconee County	YES	YES
Charlton County	YES	YES	Paulding County	YES	YES
Chatham County	YES	YES	Pickens County	YES	YES
Chattooga County	YES	YES	Pulaski County	YES	CLEAN
Cherokee County	YES	YES	Randolph County	YES	YES
Clayton County	YES	YES	Richmond County	YES	YES
Cobb County	YES	YES	Stephens County	YES	YES
Columbia County	YES	YES	Stewart County	YES	YES
Cook County	YES	YES	Talbot County	YES	YES
Crisp County	YES	YES	Tattnall County	YES	YES
Dawson County	YES	YES	Troup County	YES	YES
DeKalb County	YES	YES	Upson County	YES	Yes
Early County	YES	YES	Wayne County	YES	YES
Elbert County	YES	YES	Whitfield County	YES	YES
Fannin County	YES	CLEAN	Worth County	YES	YES

In addition, we found another issue regarding the software on Georgia's precinct level scanners. The software in question is:

**Version: 5.5.3-0002 #2 Fri Jul 27 09:18:31 CDT 2018**

**The current software version was created on Friday, July 27, 2018.** This date is concerning because this software has been running on the Dominion precinct scanners throughout Georgia since the scanners were initially installed. The implication is that defective software has been causing scanners to tabulate incorrectly since installation. For instance, our team obtained scanner SLOG from the Gwinnett County 2020 Primary. We found 84 instances of the same Williamson County Tennessee error in Gwinnett's 2020 Primary file alone. See below:

## Gwinnett Co. GA 2020 Primary

```

Jun 16/2020 11:30:48: Accepting batch 8 of 327 ballots.
Jun 16/2020 11:31:19: BATCH 9 Scanning (auto-detect) started ----->
Jun 16/2020 11:31:23: Ballot 1:      Id=221 Cast.
Jun 16/2020 11:31:24: Ballot 2:      Id=207 Cast.
Jun 16/2020 11:31:24: Ballot 3:      Id=226 Cast.
Jun 16/2020 11:31:25:  Security Error  QR code Signature mismatch.
Jun 16/2020 11:31:25:  ScanVote Warning  + Ballot format or id is unrecognizable.
Jun 16/2020 11:31:25: Ballot 4:      - Problem Ballot - saved as C:\DVS\March 2020 AIP ICC
2\Project\NotCastImages\NotCast_009_001_001.tif.
Jun 16/2020 11:31:25: Jun 16/2020 Ballot 5:      Skipped.
Jun 16/2020 11:31:25: Jun 16/2020 Ballot 6:      Skipped.
Jun 16/2020 11:31:26: Jun 16/2020 Ballot 7:      Skipped.
Jun 16/2020 11:31:26: Jun 16/2020 BATCH 9 Scanning ended (36 ppm) <-----
Jun 16/2020 11:31:27:  Stopped on ballot 4. Ballot misread..
Jun 16/2020 11:31:51: BATCH 9 Scanning (auto-detect) started ----->
Jun 16/2020 11:31:55:  Security Error  QR code Signature mismatch.
Jun 16/2020 11:31:55:  ScanVote Warning  + Ballot format or id is unrecognizable.
Jun 16/2020 11:31:55: Ballot 4:      - Problem Ballot - saved as C:\DVS\March 2020 AIP ICC
2\Project\NotCastImages\NotCast_009_002_001.tif.
Jun 16/2020 11:31:55: Jun 16/2020 Ballot 5:      Skipped.
Jun 16/2020 11:31:56: Jun 16/2020 Ballot 6:      Skipped.
Jun 16/2020 11:31:56: Jun 16/2020 Ballot 7:      Skipped.

```

# 84 instances

The incident in Williamson County, Tennessee took place in the City of Franklin. Franklin is the county seat of Williamson County, Tennessee, population 260,000. It lies 21 miles south of Nashville and it is one of the principal cities of the Nashville metropolitan area in middle Tennessee. As of 2020, the city of Franklin's population was 83,454. It is the seventh-largest city in Tennessee.

A letter from the Secretary of State of Tennessee, Tre Hargett, in February 2022, illustrates how urgent and important this issue is to our elections in Georgia. After extensive due diligence and careful consideration, the Secretary of State recommended that the Dominion Voting machines not be used in future elections. (Excerpts below, full letter attached)

## State of Tennessee



The Secretary of State  
State Capitol  
Nashville, Tennessee 37243-0305

Tre Hargett  
Secretary of State

615-741-2819  
Tre.Hargett@tn.gov

February 16, 2022

Commissioner Robert Brown  
Chairman  
Williamson County Election Commission  
405 Downs Boulevard  
Franklin, TN 37064

Dear Chairman Brown and members of the commission,

Due to the urgency of the pending May election, we wanted to inform you that it is our recommendation that Dominion voting machines not be used in Williamson County. As further discussed below, Dominion has not provided suitable service to the Williamson County Election Commission.



Given the questions regarding the cause of the issue in the Franklin City Election, the voting system cannot be used in its current configuration in 2022. Although the May election is approaching quickly and poll workers need to be trained before early voting begins on April 13, it is our recommendation that you seek a new voting system for the elections this year.

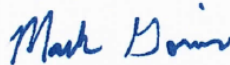
We stand ready to assist you however we can, including with funds available through the Help America Vote Act. The immediate question will be one of process to determine the proper procurement process under the abbreviated time frame. A short-term lease may be the most feasible option.

We recognize the difficult position you are in. Please let us know how we can help you throughout this process, and thank you for your service to the voters of Williamson County.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tre Hargett".

Tre Hargett  
Secretary of State

A handwritten signature in blue ink, appearing to read "Mark Goins".

Mark Goins  
Coordinator of Elections

In the interest of Georgia's ACCURATE and VERIFIABLE elections, we ask that you advise Governor Kemp and Secretary Raffensperger to void the State's contract with Dominion for failure to deliver on their obligations for accurate elections and demand a refund for Georgia taxpayers. If the Governor and Secretary do not void the contract for these error prone and faulty machines, we ask that you:

1. require every single county to check the number of paper ballots in each scanner at the end of each day, compare that number of ballots to the number to the votes cast on the machines and compare the number of ballots cast to the number of voters who checked in to each poll, and further verify that the number of votes cast equal the number of voters who enter each poll and, most importantly (this is how the Williamson error was found),
2. have representatives from each party select and 20% of the polls to audit to verify by hand count that the paper ballots cast in a precinct scanner match the digital images and the digital results of votes cast.

Dominion and the Secretary of State of Georgia, in their marketing materials proclaiming the virtues of the machines, both reference that results can be verified with audits of the paper ballots. Right now, the only person who touches a ballot after the voter is the person who locks them in a sealed box to later be destroyed. If Georgia voters are to believe these machines are accurate, it should be proven at every election (see next page).



**Q: How is the new system secured?**

The new, paper-ballot system will enable Georgia to defend against cyber threats and deliver reliable election results which can be audited using paper ballots.

- Like the existing voting machines, the new machines do not connect to the Internet, which limits cybersecurity risks. They also create an auditable paper-ballot, with other enhanced review capabilities for the public.
- Dominion's product security protocols meet or exceed federal U.S. Election Assistance Commission Voluntary Voting System Requirements.
- The new, paper-ballot system has significant upgrades to help protect against cyber threats, including use of encryption, multi-factor authentication and role-based access controls.

**Q: What if I'm concerned about computer printed ballots with bar codes?**

Most tabulation systems that count paper ballots currently use a barcode to accurately and efficiently count each vote. The Dominion touchscreens also produces a human-readable ballot summary for voter verification. Plus, election officials test and affirm the security of the system prior to every election, as well as during post-election audits. While voters can be confident in the ability of the paper-ballot system to ensure trustworthy and accurate election results, Dominion will be working with the Secretary of State's office to address perceived concerns regarding use of marked ballots that feature barcodes. For example, the state can make scanned images of all ballots cast in statewide elections available, allowing anyone to do a ballot count to check the accuracy of results.

The Secretary of State, Brad Raffensperger, the Secretary of State's election staff, Dominion Systems and even the United States Election Assistance Commission, have demonstrated their failure to properly test the Dominion Image Cast Precinct (ICP) scanners statewide. What's worse, is that the Secretary of State has not bothered to verify any of the results coming from any precinct scanners at the counties. The voting system should be tested and verified for accuracy, but the Secretary of State is doing nothing to ensure accuracy in Georgia elections.



**IMPORTANT:** The Secretary of State and his office will soon announce they are removing QR codes from the ballots. Removing QR codes will do nothing to fix the Williamson Error because software analyst we've spoke to tell us that a "QR Code Signature Mismatch" does not really exist. It is not a bug in the system because the system is not matching QR codes to anything – it is reading and reporting.

Georgia's 2022 Primary and Runoff elections were both affected by this error in nearly every county. The mid-terms in November will be here soon and we know for a fact the results will not be accurate.

One of our team members will be happy to meet with you to show you the full data set so that you can resolve this situation immediately.

Sincerely,



David A. Cross



Kevin Moncla



Joseph Rossi

cc: Governor Brian Kemp  
206 Washington Street, Ste 203  
State Capitol  
Atlanta, GA 30334

# **United States Election Assistance Commission Report of Investigation**

**Dominion Voting Systems D-Suite 5.5-B  
Williamson County, Tennessee**

March 31, 2022



Jonathon Panek  
Director, Voting System Testing and Certification



**U.S. ELECTION ASSISTANCE COMMISSION**  
633 3rd St. NW, Suite 200  
Washington, DC 20001

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## U.S. ELECTION ASSISTANCE COMMISSION

633 3rd St. NW, Suite 200  
Washington, DC 20001

### Introduction

In late 2002, Congress passed the Help America Vote Act of 2002 (HAVA), which created the U.S. Election Assistance Commission (EAC) and vested it with the responsibility of setting voting system standards and providing for the testing and certification of voting systems. This mandate represented the first time the Federal government provided for the voluntary testing, certification, and decertification of voting systems nationwide. In response to this HAVA requirement, the EAC has developed the Federal Voting System Testing and Certification Program.

The EAC's Testing and Certification Program includes several quality monitoring tools that help ensure that voting systems continue to meet the EAC's voting system standards as the systems are manufactured, delivered, and used in Federal elections. These aspects of the program enable the EAC to independently monitor the continued compliance of fielded voting systems. One of these tools is field anomaly reporting.

Election officials may submit notices of voting system anomalies directly to the EAC. An anomaly is defined as an irregular or inconsistent action or response from the voting system, or system component, which resulted in the system or component not functioning as intended or expected. Anomaly reports may indicate a voting system is not in compliance with the Voluntary Voting System Guidelines or the procedural requirements of this EAC Testing and Certification Program.

An informal inquiry is the first step taken when information of this nature is presented to the EAC. The sole purpose of the informal inquiry is to determine whether a formal investigation is warranted. The outcome of an informal inquiry is limited to a decision on referral for investigation. A formal investigation is an official investigation by the EAC to determine whether a voting system warrants decertification. The result of a formal investigation is a Report of Investigation.

### Reported Anomaly

On November 3, 2021, the EAC received a report from the Tennessee Secretary of State's (TN SoS) office that they were planning an investigation into an anomaly observed in Williamson County, Tennessee during a municipal election held on October 26, 2021, regarding Dominion D-Suite 5.5-B ImageCast Precinct (ICP) tabulators. Close poll reports from 7 of the 18 ICP tabulators used during the election did not match the number of ballots scanned. Subsequent tabulation on the jurisdiction's ICC central count scanner provided the correct tally. The central count tabulation was confirmed via hand count of the paper ballot records on October 27, 2021.

Discussions with the TN SoS on December 17, 2021, and January 5, 2022, following their investigation, provided additional details to the EAC. The details of the anomaly were

US Election Assistance Commission  
Report of Investigation

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## U.S. ELECTION ASSISTANCE COMMISSION

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Washington, DC 20001

confirmed and reproduced during the state investigation, though the root cause of the anomaly was not determined.

### Formal Investigation

Based upon the information obtained from the TN SoS, the EAC initiated a formal investigation into the matter to determine the necessary actions to obtain the root cause and remedy the issue. The investigation was conducted at the Williamson County Elections Commission facility on January 19 through January 22, 2022. This analysis was performed by both EAC accredited Voting System Test Laboratories (VSTL), Pro V&V and SLI Compliance. The EAC, Williamson County staff, TN SoS, and Dominion staff were present during the analysis.

### Testing and Analysis

The first step of the VSTL analysis was verification of the system configuration. Hashes of all components involved were collected and compared to the repository of hashes for the EAC certified system. It was discovered that the system was installed with outdated versions of two configuration files when the system was upgraded from D-Suite 5.5 to D-Suite 5.5-B in January of 2021.

Next, a copy of the election definition used on election day was used to make Compact Flash (CF) cards for the ImageCast Precinct (ICP) scanners and ImageCast X (ICX) ballot marking devices. This election definition was imported into the D-Suite 5.5-B system from a definition originally created on the D-Suite 5.5 system.

Ballots were printed from the ICX and tabulated through the ICP scanners. Multiple ICP scanners were used for tabulation including some that originally exhibited the anomaly during the election and some that did not. Following tabulation, close poll reports and audit logs from the ICP scanners were examined. Results showed that the anomaly was recreated on each of the ICP scanners. This process was repeated several times to understand and isolate the details of exactly when the anomaly occurred and circumstances that may have led to the anomaly occurring.

Analysis of audit log information revealed entries that coincided with the manifestation of the anomaly; a security error "QR code signature mismatch" and a warning message "Ballot format or id is unrecognizable" indicating a QR code misread occurred. When these events were logged, the ballot was rejected. Subsequent resetting of the ICP scanners and additional tabulation demonstrated that each instance of the anomaly coincided with the previously mentioned audit log entries, though not every instance of those audit log entries resulted in the anomaly.

Further analysis of the anomaly behavior showed that the scanners correctly tabulated all ballots until the anomaly was triggered. Following the anomaly, ballots successfully scanned



**U.S. ELECTION ASSISTANCE COMMISSION**

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Washington, DC 20001

and tabulated by the ICP were not reflected in the close poll reports on the affected ICP scanners.

Additional iterations of testing were performed after updating the configuration files previously mentioned to the proper versions associated with the D-Suite 5.5-B system. The anomaly was recreated using the correct configuration files with the originally programmed election definition.

A final test was performed using an election definition recreated entirely on the D-Suite 5.5-B system with identical parameters to the definition used during the election and for prior testing. The anomaly was not observed during this test, and there were no instances of the security error "QR code signature mismatch" or warning message "Ballot format or id is unrecognizable" in the audit log.

### **Conclusion of Formal Investigation**

The direct cause of the anomaly was inconclusive. Based on the investigation, it's reasonable to conclude that the anomaly is related to the imported D-Suite 5.5 election definition used on the D-Suite 5.5-B system.

On February 11, 2022, Dominion submitted a Root Cause Analysis (RCA) to the EAC. The report indicates that erroneous code is present in the EAC certified D-Suite 5.5-B and D-Suite 5.5-C systems. The RCA report states that when the anomaly occurs, it's due to a misread of the QR code. If the QR code misread affects a certain part of the QR code, the ICP scanner mistakenly interprets a bit in the code that marks the ballot as provisional. Once that misread happens, the provisional flag is not properly reset after that ballot's voting session. The result is that every ballot scanned and tabulated by the machine after that misread is marked as provisional and thus, not included in the tabulator's close poll report totals.

Dominion has submitted Engineering Change Orders (ECO)s for the ICP software in the D-Suite 5.5-B and D-Suite 5.5-C systems: ECO 100826 and ECO 100827. Modified ICP source code was submitted by Dominion that resets the provisional flag following each voting session. The ECO analysis included source code review to confirm the change to both systems and to ensure no other code is changed. A Trusted Build of the modified source code was performed to produce the updated ICP software. This software was then tested for accuracy by processing two thousand ballots printed by an ICX, utilizing the same election definition used in Williamson County, TN on October 26, 2021.

The analysis and testing of the ECOs has demonstrated that the anomaly was successfully fixed. No instance of the anomaly or the associated error or warning messages in the ICP audit logs were observed during the testing. The EAC has approved ECO 100826 and ECO 100827 on March 31, 2022.



State of Tennessee



The Secretary of State  
State Capitol  
Nashville, Tennessee 37243-0305

Tre Hargett  
Secretary of State

615-741-2819  
Tre.Hargett@tn.gov

February 16, 2022

Commissioner Robert Brown  
Chairman  
Williamson County Election Commission  
405 Downs Boulevard  
Franklin, TN 37064

Dear Chairman Brown and members of the commission,

Due to the urgency of the pending May election, we wanted to inform you that it is our recommendation that Dominion voting machines not be used in Williamson County. As further discussed below, Dominion has not provided suitable service to the Williamson County Election Commission.

The Williamson County Election Commission purchased the Dominion D-Suite voting system in 2019. In the configuration used by Williamson County, the voter makes selections on an ImageCast X (ICX) ballot marking device, reviews their selections on a printed ballot, and inserts the ballot into an ImageCast Precinct (ICP) optical scanner to be counted. In 2021, the firmware was updated from version 5.5 to version 5.5-B.

As you are aware, an issue occurred in the 2021 Franklin City Election where the tapes from several scanners did not match the number of votes cast, but the centrally tabulated results contained all of the results. After identifying the issue on election night, you completed the count the next day by hand counting the ballots. The following summarizes information regarding the steps taken to determine the cause and a solution for the issue.

- **August 2021** – Dominion programs the election for the Franklin City Election. Williamson County Election Commission staff notifies Dominion that the election has been programed incorrectly. Dominion must reprogram the election because they initially based it on the 2019 election conducted prior to implementation of vote centers.
- **October 26, 2021 (Election Day)** – Tapes printed from 7 of 19 scanners used in the election did not contain all ballots cast on the scanner, but all ballots are counted in the central tabulation when results are delivered to the election commission office based off the hand count.

sos.tn.gov



- **October 27, 2021** – Williamson County Election Commission completes the unofficial count by hand counting paper ballots.
- **November and December 2021** – The state has discussions with the federal Election Assistance Commission regarding the Franklin City Election.

State election officials, local election officials, and technical staff visit Williamson County to review equipment used in the election. The scanner audit logs show a high number of affected ballots.

As part of the testing, ballots from one vote center are recreated and processed through several scanners. The issue is replicated randomly on multiple scanners. The tape printed from the scanner contains all results until the first affected ballot. For example, if a batch of 10 ballots was scanned and ballot 6 in the stack was affected, the tape would show only 6 votes.

- **December 2021** – Coordinator Goins notifies Williamson County that he is going to request further review from a federal voting system test laboratory (VSTL).
- **January 19-22, 2022** – Representatives from the EAC and both VSTLs (Pro V&V and SLI Compliance) conduct testing on the equipment in the presence of the Secretary of State and Division of Elections staff.

The issue is once again replicated randomly. The following observations are made:

- When the 2019 election project was copied to create the 2021 election project, the device configuration file (DCF) and machine configuration file (MCF) from 2019 were also copied. The 2019 configuration files are associated with D-Suite 5.5 instead of 5.5-B.
- The configuration files did not match the firmware version of the ICX and ICP, resulting in a configuration that had not been previously tested for certification by the VSTLs. Neither the ICX nor the ICP displayed any kind of error notification about an improper configuration or about the mismatch between the number of ballots cast and the number of ballots on the tape.
- When an election project is created from scratch in 5.5-B with the correct configuration files and loaded onto the ICX and ICP, limited testing showed no scanner errors.

Dominion representatives have complained about lack of access to the equipment since the Franklin City Election. At all times since the issue was identified, however, Dominion has had access to the election that they programmed for Williamson County and the ability to conduct their own testing.

Given the questions regarding the cause of the issue in the Franklin City Election, the voting system cannot be used in its current configuration in 2022. Although the May election is approaching quickly and poll workers need to be trained before early voting begins on April 13, it is our recommendation that you seek a new voting system for the elections this year.

We stand ready to assist you however we can, including with funds available through the Help America Vote Act. The immediate question will be one of process to determine the proper procurement process under the abbreviated time frame. A short-term lease may be the most feasible option.

We recognize the difficult position you are in. Please let us know how we can help you throughout this process, and thank you for your service to the voters of Williamson County.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tre Hargett".

Tre Hargett  
Secretary of State

A handwritten signature in blue ink, appearing to read "Mark Goins".

Mark Goins  
Coordinator of Elections



Source: <https://securevotega.com/wp-content/uploads/2019/11/Georgia-Voting-System-Frequently-Asked-Questions-1.pdf>

## Frequently Asked Questions

### **Q: Why is the State of Georgia replacing its current voting system?**

The Georgia State Legislature approved the purchase of a new, statewide voting system in order to replace aging, paperless election equipment dating back to 2002. The new system offers Peach State voters more modern, up-to-date technology with important security and transparency features. The new system will also produce a paper ballot to allow for verification and auditing of election results.

### **Q: How did the state choose the system?**

Georgia's Secure, Accessible, and Fair Elections (SAFE) Commission presented a report to the state legislature in January 2019, which used the expert recommendations to adopt a new law for the state's voting system purchase. The procurement process was overseen by the Georgia Department of Administrative Services and handled the same way as other competitive bids. An evaluation committee scored each applicant based on an appraisal of cost and ability to meet the state's voting system specifications, which included accuracy, security, auditability, and ease of use for poll managers and voters. Dominion Voting Systems had the highest overall score and was awarded the contract.

### **Q: How does the new voting system work?**

The Secure the Vote GA System features user-friendly touchscreen selection like Georgia voters have enjoyed using for the last 17 years, with the addition of a secure, paper ballot. Once a voter has confirmed their choices on the screen, they will print their ballot recording their choices in plain language and in a QR barcode that provides extra security and speeds processing. With ballot in hand, they can look over their selections again. When they are satisfied that the ballot reflects their choices, they walk to a scanner and insert the ballot. The scanner will record an image of the ballot as well as tally the votes. The ballot then drops into a locked, tamperproof ballot box. The paper ballots are used for verifying and auditing results. The next-generation system also offers enhanced audit capabilities for security, as well as features to improve the voter experience.

2 MARTIN LUTHER KING JR DRIVE, SUITE 802 WEST TOWER | ATLANTA, GEORGIA 30334 | 470.312.2635

**SecureTheVoteGA.com**



**Q: Why is this the best system for Georgia?**

The new, paper-ballot system offers reliability and assurance, balancing the need for both security and accessibility in the voting process. Touchscreens have proven to reduce the rate of under-votes, over-votes and stray-marked votes in elections. They can specifically alert voters if they have skipped or missed a ballot selection, ensuring that all voting choices are complete. The system also provides full accessibility for people with disabilities and/or language or literacy challenges, allowing all voters to privately and independently cast a ballot using the same system. These touchscreens also produce paper-ballots for auditing and reduce paper volumes overall.

**Q: Where can I learn more about the system?**

The Secretary of State's office is conducting public demonstrations around the state, with additional county voter outreach opportunities.

**Q: What is the plan for installing the new system for use in Georgia elections?**

The state is taking a phased-in approach, with a county pilot program for the November 2019 municipal election cycle. Statewide system replacement will be completed for the March 24, 2020 Presidential Preference Primary.

**Q: How much does the new system cost, and what does the purchase include?**

The system cost is approximately \$107 million. The contract includes voting system hardware, software, implementation, training and support for the new statewide system.

**Q: What are the general system components?**

Georgia's paper-ballot system includes:

- ImageCastX Ballot Marking Device (the touchscreen): A universal voting device with accessible options, the touchscreen operates with a printer that produces a paper ballot.
- ImageCast Precinct Polling Place Scanner: Allows ballots to be scanned, capturing ballot images for auditing/review.

2 MARTIN LUTHER KING JR DRIVE, SUITE 802 WEST TOWER | ATLANTA, GEORGIA 30334 | 470.312.2635

**SecureTheVoteGA.com**





**Q: How is the new system secured?**

The new, paper-ballot system will enable Georgia to defend against cyber threats and deliver reliable election results which can be audited using paper ballots.

- Like the existing voting machines, the new machines do not connect to the Internet, which limits cybersecurity risks. They also create an auditable paper-ballot, with other enhanced review capabilities for the public.
- Dominion's product security protocols meet or exceed federal U.S. Election Assistance Commission Voluntary Voting System Requirements.
- The new, paper-ballot system has significant upgrades to help protect against cyber threats, including use of encryption, multi-factor authentication and role-based access controls.

**Q: What if I'm concerned about computer printed ballots with bar codes?**

Most tabulation systems that count paper ballots currently use a barcode to accurately and efficiently count each vote. The Dominion touchscreens also produces a human-readable ballot summary for voter verification. Plus, election officials test and affirm the security of the system prior to every election, as well as during post-election audits. While voters can be confident in the ability of the paper-ballot system to ensure trustworthy and accurate election results, Dominion will be working with the Secretary of State's office to address perceived concerns regarding use of marked ballots that feature barcodes. For example, the state can make scanned images of all ballots cast in statewide elections available, allowing anyone to do a ballot count to check the accuracy of results.

David A. Cross  
4805 Spring Park Circle  
Suwanee, GA 30024  
678-925-6983  
dcross108@protonmail.com

March 10, 2022

Georgia State Election Board  
2 MLK Jr. Drive  
Suite 802 Floyd West Tower  
Atlanta, Georgia 30334

Mr. Brad Raffensperger  
Secretary of State  
214 State Capitol  
Atlanta, Georgia 30334  
[brad@sos.ga.gov](mailto:brad@sos.ga.gov)

RE: OFFICIAL COMPLAINT


Ladies and Gentlemen:

I am part of a volunteer team of citizens investigating irregularities in the contested November 2020 General Election. I am writing to file a complaint regarding Fulton County and their handling of the tabulation of advance voting results. I have attached several sample tabulator poll tapes that show no signature whatsoever by any of 3 poll workers as required by Georgia Law. Through our many Open Records Requests, Fulton County has provided tabulator tapes like the ones provided below that affect over 315,000 votes. None of the tabulator tapes provided by Fulton County were signed as required by law.

As a remedy, I am asking that you decertify the originally reported Advance Voting results for Fulton County's November 3, 2020 General Election. Fulton County's results are not certifiable and should never have been certified due to the failure of processes and documents not being completed properly. It is my belief that compact flash (CF) cards were removed from each polling place tabulator and sent to English Street for tabulation behind closed doors by an independent contractor of Dominion with expertise in CF cards and Results Tally Reporting software. Secretary of State Brad Raffensperger's office never conducted a check or an audit of the results and certainly never viewed the tabulator tapes.

According to O.C.G.A. §21-2-499 (2019) in the event an error is found in the certified returns, presented to the Secretary of State or in the tabulation, computation, or canvassing of votes as described in this Code section, the Secretary of State shall notify the county submitting the incorrect returns and direct the county to correct such returns.

Because of the clear violation of the handling of tabulator tapes, it is not logical to assume that the originally reported Advance Voting results are authentic and for this reason, I respectfully ask that you decertify Fulton County's Advance Voting results for the November 2020 General Election. The applicable Election Laws are cited below:



# Rules and Regulations of the State of Georgia

Hierarchy Search: ☒ Y ☐ N

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Route : [GA R&R](#) » [Department 183](#) » [Chapter 183-1](#) » [Subject 183-1-14](#)

(13) At the end of the advance voting period, the registrars shall record the election counter number from each ballot scanner on the daily recap sheet. The ballot scanners shall be shut down and sealed. The registrars shall record the seal numbers on the daily recap sheet. The registrar and two sworn witnesses shall unseal the ballot box, remove the paper ballots, and place the ballots in one or more durable, portable, secure, and sealable containers. The registrars shall complete and affix to each container a form identifying the advance voting location, the advance voting dates that the ballots were cast, ballot scanner serial number, the number assigned to that ballot scanner for that specific election, the count of the ballots from the ballot scanner, and the date and time that the ballot box was emptied. The container shall be sealed and signed by the registrar and the two witnesses such that it cannot be opened without breaking the seal. The ballot box shall be resealed, and the new seal numbers shall be documented. The registrar and at least one sworn witness shall deliver the ballot container to the election superintendent for secured storage until time for the tabulation of votes, and the election superintendent shall complete a chain of custody form indicating the delivery of the secure container. The form shall be signed by the registrar and any witnesses who travelled with the registrar indicating that no sealed documents were unsealed enroute and have not been tampered with. The ballot scanners and ballot containers shall then be secured until time for the tabulation of votes.

(14) By the close of the polls on the day of the primary, election, or runoff, the registrars shall deliver all of the ballot scanners used for advance voting and all other absentee ballots received to the election superintendent or the tabulating center. The election superintendent or tabulating center personnel shall count all of the absentee ballots in accordance with the procedures required by law and the rules of the State Election Board. The election superintendent or tabulating center personnel shall verify the seal numbers of each ballot scanner with the numbers recorded on the daily recap sheet form and shall inspect each seal and unit to verify that there is no evidence of tampering with the unit. If the seal numbers are not correct or there is evidence of tampering, the Secretary of State and the election superintendent shall be notified immediately and no further action shall be taken with regard to such unit until the reason for the discrepancy has been determined to the satisfaction of the election superintendent.

(15) After verifying the seal number and the integrity of the seal on each ballot scanner, the election superintendent or tabulating center personnel shall open each ballot scanner and turn on the power. The election superintendent or tabulating center personnel shall then compare the numbers shown on the election counters of the ballot scanners with the numbered list of absentee electors and the absentee ballot recap form to verify that there are no discrepancies. If there is a discrepancy, no further action shall be taken until the reason for the discrepancy has been determined to the satisfaction of the election superintendent. The election superintendent or tabulating center personnel shall cause each ballot scanner to print a minimum of three tapes showing the vote totals as cast on that ballot scanner. Three witnesses shall sign each of the tapes or shall write on the tapes the reason why they will not sign the tapes. One copy of the results tape for each ballot scanner shall be made available for the information of the public. One tape shall be placed into an envelope (or reusable document storage container suitable for the same purpose), provided by the election superintendent along with "poll worker" memory cards from the ballot scanner. The envelope shall be sealed by the poll manager and the same two witnesses who signed the tape such that the envelope cannot be opened without breaking such seal. The envelope shall be initialed by the poll manager and the two witnesses indicating that it contains the correct tape and memory card from the indicated ballot scanner. The envelope shall be labelled with the name of the polling place, the serial number of the ballot scanner, and the number assigned to the ballot scanner for that election. The third tape shall be placed into another envelope with the absentee ballot recap form.

(16) After completing the printing of the results, the ballot scanner shall be turned off, secured, and resealed. The ballot scanners shall then be placed in a secure area with appropriate climate control. The envelopes containing the memory cards and results tapes, voter access cards, poll worker cards, ballot encoder devices, numbered lists of absentee voters, absentee ballot recap forms, and other such paperwork shall be transported to the office of the election superintendent by the election superintendent or tabulating center personal, which transportation shall at all times involve at least two authorized individuals. The office of the election superintendent shall receive the materials and shall document delivery. The election superintendent or tabulating center personal who travelled with the materials shall sign a form indicating that no sealed documents were unsealed enroute and that the materials have not been tampered with.

\*\*\*\*\*

County  
Fulton Nov 2020  
General

Tuesday, November 3, 2020

Tabulator Name

AV-Welcome All Rec Ctr ICP 3

Tabulator ID

325

Voting Location

AV-Welcome All Rec Ctr

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Poll Opened

Oct 12/2020 06:40:15

Poll Closed

Nov 04/2020 00:26:39

Report Printed

Nov 04/2020 00:30:57  
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Unit Model: PCOS-320C (Rev 1072)

Unit Serial: AAFAJJP0099

Protective Counter: 1664

Software Version: 5.5.3-0002  
-----

Total Scanned: 2625

Total Voters: 2625

President of the United States (1)
---------------------------------------

Donald J. Trump (I) (Rep):	62
----------------------------	----

Joseph R. Biden (Dem):	2547
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Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

-----  
Name

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Signature

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Name

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Signature

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Name

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Signature

Poll closed.

Nov 04/2020 00:30:57

Tabulator Name

AV-Welcome All Rec Ctr ICP 3



County  
Fulton Nov 2020  
General

Tuesday, November 3, 2020

Tabulator Name

AV-Welcome All Rec Ctr ICP 1

Tabulator ID

323

Voting Location

AV-Welcome All Rec Ctr

Poll Opened

Oct 14/2020 07:46:37

Poll Closed

Nov 04/2020 02:09:33

Report Printed

Nov 04/2020 02:12:17

Unit Model: PCOS-320C (Rev 1072)

Unit Serial: AAFJJY0174

Protective Counter: 929

Software Version: 5.5.3-0002

Total Scanned: 217

Total Voters: 217

President of the  
United States (1)

Donald J. Trump (1) (Rep): 1

Joseph R. Biden (Dem): 213

Jo Jorgensen (Lib): 3

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

-----  
Name

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Signature

Poll opened 2 days late

-----  
Name

Poll closed and report printed at 2:09 am Nov 4th

-----  
Signature

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Name

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Signature

Poll closed.

Nov 04/2020 02:12:17.

Tabulator Name

AV-Welcome All Rec Ctr ICP 1

\*\*\*\*\*

County  
Fulton Nov 2020  
General  
Tuesday, November 3, 2020

Tabulator Name  
AV-Welcome All Rec Ctr ICP 4

Tabulator ID  
713

Voting Location  
AV-Welcome All Rec Ctr

-----  
Poll Opened  
Oct 20/2020 09:38:59  
Poll Closed  
Nov 03/2020 21:22:32  
Report Printed  
Nov 03/2020 21:27:24  
-----

Unit Model: PCOS-320C (Rev 1072)  
Unit Serial: AAFAJIV0104  
Protective Counter: 2481  
Software Version: 5.5.3-0002  
-----

Total Scanned: 2600  
Total Voters: 2600

President of the  
United States (1)

Donald J. Trump (1) (Rep):	111
Joseph R. Biden (Dem):	2444

# Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

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Name

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Signature

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Name

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Signature

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Name

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Signature

Poll closed.  
Nov 03/2020 21:27:24

Tabulator Name  
AV-Welcome All Rec Ctr ICP 4

Poll opened 8 days late

\*\*\*\*\*

County  
Fulton Nov 2020  
General  
Tuesday, November 3, 2020

Tabulator Name  
AV-So Fulton Srvc Center ICP 2

Tabulator ID  
2655

Voting Location  
AV-So Fulton Srvc Center

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Poll Opened  
Oct 12/2020 08:09:59  
Poll Closed  
Nov 03/2020 23:18:18  
Report Printed  
Nov 03/2020 23:21:40  
-----

Unit Model: PCOS-320C (Rev 1072)  
Unit Serial: AFAJJS0001  
Protective Counter: 148  
Software Version: 5.5.3-0002  
-----

Total Scanned: 3581  
Total Voters: 3581

President of the United States (1)	
Donald J. Trump (I) (Rep):	131
Joseph R. Biden (Dem):	3421

## Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

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Name

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Signature

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Name

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Signature

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Name

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Signature

Duplicate serial number

Poll closed.  
Nov 03/2020 23:21:40

Tabulator Name  
AV-So Fulton Srvc Center ICP 2

## General

Tuesday, November 3, 2020

Tabulator Name  
AV-CT Martin Rec Center ICP 1

Tabulator ID  
2590

Voting Location  
AV-CT Martin Rec Center

Poll Opened  
Oct 12/2020 06:16:49

Poll Closed  
Nov 03/2020 23:57:36

Report Printed  
Nov 04/2020 00:00:39

Unit Model: PCOS-320C (Rev 1072)  
Unit Serial: AAFJIV0104  
Protective Counter: 2481  
Software Version: 5.5.3-0002

Total Scanned: 3302  
Total Voters: 3302

President of the  
United States (1)

Donald J. Trump (1) (Rep):	104
Joseph R. Biden (Dem):	3163

## Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

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Name

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Signature

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Name

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Signature

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Name

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Signature

Poll closed.

Nov 04/2020 00:00:39

Tabulator Name

AV-CT Martin Rec Center ICP 1



county  
 Fulton Nov 2020  
 General  
 Tuesday, November 3, 2020

Tabulator Name  
 AV-CT Martin Rec Center ICP 2

Tabulator ID  
 2595

Voting Location  
 AV-CT Martin Rec Center

-----

Poll Opened  
 Oct 12/2020 06:20:37

Poll Closed  
 Nov 04/2020 00:31:40

Report Printed  
 Nov 04/2020 00:34:54

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Unit Model: PCOS-320C (Rev 1072)  
 Unit Serial: AAFJJJS0001  
 Protective Counter: 148  
 Software Version: 5.5.3-0002

-----

Total Scanned: 3456  
 Total Voters: 3456

President of the United States (1)	
Donald J. Trump (I) (Rep):	105
Joseph R. Biden (Dem):	3313

## Certification

WE, THE UNDERSIGNED ELECTION  
 OFFICIALS, HEREBY CERTIFY THAT  
 THE ABOVE ELECTION WAS HELD IN  
 ACCORDANCE WITH THE LOCAL  
 AUTHORITY ELECTION ACT AND  
 REGULATIONS OF THIS  
 JURISDICTION.

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 Name

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 Signature

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 Name

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 Signature

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 Name

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 Signature

Poll closed.  
 Nov 04/2020 00:34:54

Tabulator Name  
 AV-CT Martin Rec Center ICP 2

Duplicate serial number

County  
Fulton Nov 2020  
General  
Tuesday, November 3, 2020

Tabulator Name  
AV-CT Martin Rec Center ICP 4

Tabulator ID  
759

Voting Location  
AV-CT Martin Rec Center

Poll Opened Poll opened 14 days late

Oct 28/2020 07:02:04

Poll Closed

Nov 04/2020 02:18:04

Report Printed

Nov 04/2020 02:18:47

Unit Model: PCOS-320C (Rev 1072)

Unit Serial: AAFAJJS0001

Protective Counter: 148

Software Version: 5.5.3-0002

Duplicate Serial Number

Total Scanned: 739

Total Voters: 739

President of the  
United States (1)

Donald J. Trump (1) (Rep): 31

Joseph R. Biden (Dem): 691

Jo Jorgensen (Lib): 11

Write-in: 3

Total Votes: 736

# Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name

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Signature

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

Poll closed.  
Nov 04/2020 02:18:47

Tabulator Name  
AV-CT Martin Rec Center ICP 4

\*\*\*\*\*

County  
Fulton Nov 2020  
General

Tuesday, November 3, 2020

Tabulator Name

AV-CT Martin Rec Center ICP 5

Tabulator ID

761

Voting Location:

AV-CT Martin Rec Center

Poll Opened

Oct 28/2020 07:07:31

Poll Closed

Nov 04/2020 02:09:47

Report Printed

Nov 04/2020 02:10:34

Unit Model: PCOS-320C (Rev 1072)

Unit Serial: AAFJJK10043

Protective Counter: 3824

Software Version: 5.5.3-0002

Total Scanned: 758

Total Voters: 758

President of the  
United States (1)

Donald J. Trump (I) (Rep): 34

Joseph R. Biden (Dem): 713

Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

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Name

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Signature

Poll opened 14 days late

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Name

Poll closed at 2:09 am Nov 4th

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Signature

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Name

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Signature

Poll closed.

Nov 04/2020 02:10:34

Tabulator Name

AV-CT Martin Rec Center ICP 5

County  
Fulton Nov 2020

General

Tuesday, November 3, 2020

Tabulator Name

AV-Wolf Creek Library ICP 3

Tabulator ID

326

Voting Location

AV-Wolf Creek Library

Poll Opened

Oct 12/2020 05:49:55

Poll Closed

Nov 03/2020 23:31:14

Report Printed

Nov 03/2020 23:34:15

Unit Model: PCOS-320C (Rev 1072)

Unit Serial: AAFJJY0174

Protective Counter: 929

Software Version: 5.5.3-0002

Total Scanned: 3286

Total Voters: 3286

President of the United States (1)	
Donald J. Trump (I) (Rep):	77
Joseph R. Biden (Dem):	3190

Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

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Name

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Signature

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Name

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Signature

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Name

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Signature

Poll closed.

Nov 03/2020 23:34:15

Tabulator Name

AV-Wolf Creek Library ICP 3



\*\*\*\*\*

County  
Fulton Nov 2020  
General

Tuesday, November 3, 2020

Tabulator Name

AV-Wolf Creek Library ICP 1

Tabulator ID

2620

Voting Location

AV-Wolf Creek Library

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Poll Opened

Oct 13/2020 11:37:37

Poll Closed

Oct 30/2020 19:33:00

Report Printed

Nov 04/2020 01:47:42  
-----

Unit Model: PCOS-320C (Rev 1072)

Unit Serial: AAFJJP0099

Protective Counter: 1664

Software Version: 5.5.3-0002  
-----

Total Scanned: 762

Total Voters: 762

President of the United States (1)	
Donald J. Trump (I) (Rep):	30
Joseph R. Biden (Dem):	726

Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

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Name

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Signature

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Name

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Signature

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Name

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Signature

Poll closed.

Nov 04/2020 01:47:42

Tabulator Name

AV-Wolf Creek Library ICP 1

\*\*\*\*\*

County  
Fulton Nov 2020  
General  
Tuesday, November 3, 2020

Tabulator Name  
AV-Wolf Creek Library ICP 2

Tabulator ID  
2625

Voting Location  
AV-Wolf Creek Library

-----  
Poll Opened  
Oct 12/2020 06:13:42  
Poll Closed  
Nov 04/2020 01:56:34  
Report Printed  
Nov 04/2020 01:58:03  
-----

Unit Model: PCOS-320C (Rev 1072)  
Unit Serial: AAFAJJS0001  
Protective Counter: 148  
Software Version: 5.5.3-0002  
-----

Total Scanned: 1578  
Total Voters: 1578

President of the United States (1)	
---------------------------------------	--

Donald J. Trump (I) (Rep):	53
Joseph R. Biden (Dem):	1512

## Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

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Name

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Signature

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Name

Poll closed at 1:56 am Nov 4th instead of 9 pm Nov 3

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Signature

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Name

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Signature

Poll closed.  
Nov 04/2020 01:58:03

Tabulator Name  
AV-Wolf Creek Library ICP 2

Duplicate Serial Number

County  
Fulton Nov 2020  
General  
Tuesday, November 3, 2020

Tabulator Name  
AV-Etris Rec Ctr ICP 2

Tabulator ID  
278

Voting Location  
AV-Etris Rec Ctr

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Poll Opened  
Oct 12/2020 05:33:46  
Poll Closed  
Nov 03/2020 22:44:01  
Report Printed  
Nov 03/2020 22:48:14  
-----

Unit Model: PCOS-320C (Rev 1072)  
Unit Serial: AAFAJJZ0088  
Protective Counter: 303  
Software Version: 5.5.3-0002  
-----

Total Scanned: 1820  
Total Voters: 1820

President of the United States (1)	
Donald J. Trump (I) (Rep):	109
Joseph R. Biden (Dem):	1701

#### Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

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Name

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Signature

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Name

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Signature

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Name

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Signature

Poll closed.  
Nov 03/2020 22:48:14

Tabulator Name  
AV-Etris Rec Ctr ICP 2

County  
Fulton Nov 2020  
General  
Tuesday, November 3, 2020

Tabulator Name  
AV-Etris Rec Ctr ICP 3

Tabulator ID  
718

Voting Location  
AV-Etris Rec Ctr

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Poll Opened  
Oct 20/2020 08:23:01

Poll Closed  
Nov 03/2020 21:39:47

Report Printed  
Nov 03/2020 21:45:36

-----

Unit Model: PCOS-320C (Rev 1072)  
Unit Serial: AAFJJJS0001  
Protective Counter: 148  
Software Version: 5.5.3-0002

-----

Total Scanned: 1109  
Total Voters: 1109

President of the United States (1)	
Donald J. Trump (1) (Rep):	76
Joseph R. Biden (Dem):	1022

## Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

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Name

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Signature

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Name

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Signature

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Name

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Signature

Poll closed.  
Nov 03/2020 21:45:36

Tabulator Name  
AV-Etris Rec Ctr ICP 3

poll opened 8 days late

Duplicate serial number



\*\*\*\*\*

County  
Fulton Nov 2020  
General  
Tuesday, November 3, 2020

Tabulator Name  
AV-GS Dennard Library ICP 2

Tabulator ID  
2555

Voting Location  
AV-GS Dennard Library

Poll Opened  
Oct 12/2020 06:03:04  
Poll Closed  
Nov 03/2020 23:38:34  
Report Printed  
Nov 03/2020 23:41:50

Unit Model: PCOS-320C (Rev 1072)  
Unit Serial: AAFAJK10043  
Protective Counter: 3824  
Software Version: 5.5.3-0002

Total Scanned: 3445  
Total Voters: 3445

President of the  
United States (1)

Donald J. Trump (R) (Rep)	120
Joseph R. Biden (Dem)	3298

### Certification

WE, THE UNDERSIGNED ELECTION  
OFFICIALS, HEREBY CERTIFY THAT  
THE ABOVE ELECTION WAS HELD IN  
ACCORDANCE WITH THE LOCAL  
AUTHORITY ELECTION ACT AND  
REGULATIONS OF THIS  
JURISDICTION.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name

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Signature

Why does the  
time stamp not  
match?

?

Poll closed.  
Nov 03/2020 02:12:04

There are too many irregularities to ignore in Fulton County. The election violations shown on these poll tapes alone are reason enough to decertify Fulton County. If you have questions or you would like to discuss this matter, please feel free to call me or have your investigators contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "David A. Cross". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

David A. Cross

cc: Governor Brian Kemp  
206 Washington Street, Ste 203  
State Capitol  
Atlanta, GA 30334

Dear State Election's Board members, Gwinnett Elections Board members & Sec. Raffensperger,

This email is an official complaint.

I was reviewing some data from 2020 with a very bright software programmer who developed a way to search for double counted ballots and he found 188 duplicated ballots in Gwinnett including this example of a triple counted ballot. Zach, you should be able to confirm to the board the authenticity of this claim because the batch number and image number is in red on the top left of the image.

Dr .Taylor, I know that you are very, very skeptical of my claims that these machines are not accurate even though I keep bringing you examples like this triple counted ballot in Gwinnett County:



Click this link for a higher resolution pdf: <https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:93461df4-729f-3880-8fc6-7badbea166b1>

Georgia Code Section 21-2-365 line 8 reads: It (the Optical Scanning system) shall, when properly operated, record correctly and accurately every vote cast;

Our voting system keeps making errors like this example. The State and the counties are not proofing the data and citizens are doing the work of the government but only after we pay fees for ballot images and other data.

Georgia Code Section 21-2-368 paragraph C reads: No kind of optical scanning voting system not so approved shall be used at any primary or election and if, upon the reexamination of any optical scanning voting system previously approved, it shall appear that the optical scanning voting system so reexamined can no longer be safely or accurately used by electors at primaries or elections as provided in this chapter because of any problem concerning its ability to accurately record or tabulate votes, the approval of the same shall immediately be revoked by the Secretary of State; and no such optical scanning voting system shall thereafter be purchased for use or be used in this state. (emphasis by David Cross)

Currently, there are no safeguards to stop a ballot from being counted multiple times. In the current configuration, Georgia's Dominion scanners are not set up to detect counterfeit ballots nor can the system discern if a ballot has been counted once or a hundred times. We do not use watermarks, security strips, randomized serial numbers or even the USPS free tracking service to stop ballots from being sent to fraudulent addresses.

How many inaccuracies must the citizens find before you take action to secure our elections? In 2024, Gwinnett is estimated to spend \$25,000,000 on elections. Do you not see that expenditure as wasteful? Shouldn't we be investing most of that money in children and human beings instead of burning it up on a system that gives questionable results with no transparency? We counted ballots by hand decades ago but we didn't have high definition cameras to keep people honest, now, we do.

To be clear, I am filing this complaint with the State Elections Board and Gwinnett County. The purpose of this complaint is to find out how this ballot was counted 3 times. There are 188 duplicate counted ballots. I look forward to hearing how this happened and why these deficiencies were never found by the state or the county.

Sincerely,

David Cross

Suwanee, Georgia  
Gwinnett County  
678-925-6983

Sent with [Proton Mail](#) secure email.

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**GWINNETT COUNTY / CONDADO DE GWINNETT**  
(34505)

**OFFICIAL ABSENTEE/PROVISIONAL/EMERGENCY BALLOT**  
**BOLETA OFICIAL AUSENTE/PROVISIONAL/EMERGENCIA**

**OFFICIAL GENERAL AND SPECIAL ELECTION BALLOT OF THE STATE OF GEORGIA**  
**BOLETA OFICIAL DE LA ELECCION GENERAL Y ESPECIAL DEL ESTADO DE GEORGIA**  
NOVEMBER 3, 2020 / 3 DE NOVIEMBRE DE 2020  
INSTRUCTIONS / INSTRUCCIONES

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2. Completely fill in the empty oval to the left of the candidate name or choice in all contests you wish to vote.  
3. Voting for a federal candidate, complete the top empty oval to the left of the written selection. Then write the name of the written candidate in the space provided.  
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1. Use tinta negra o azul para marcar la boleta.  
2. Rellenar completamente el óvalo vacío a la izquierda del nombre del candidato o de su opción en todas las carreras electorales en las que desea votar.  
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**Para el Presidente de los Estados Unidos**  
(Vote in Circle / Vota por círculo)

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<input type="radio"/> Tamara Johnson-Shelley Democratic / Democrática	<input type="radio"/> Shane Hazel Libertarian / Libertario

Write-in / Por escrito

Turn Ballot Over To Continue Voting

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(34505)

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Write-in / Por escrito

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Write-in / Por escrito

Turn Ballot Over To Continue Voting

# Exhibit D



**AFFIDAVIT OF MARK ALAN DAVIS**

Comes now, MARK ALAN DAVIS, and after being duly sworn makes the following statement under oath

1. My name is MARK ALAN DAVIS.
2. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.
3. I am a resident of the State of Georgia
4. I am the President of Data Productions, Inc. I have been working with Georgia voter data for more than thirty (30) years.
5. I created an enhanced version of the Georgia Voter Database which has been used by numerous campaigns and other organizations over the years, primarily for demographic analysis and voter contact efforts.
6. Because of that experience, I have become aware of numerous issues regarding residency and redistricting, among other concerns relating to absentee balloting. That awareness has caused me to become an advocate for election integrity for the past twenty (20) years.
7. I have been brought in as an expert witness in a total of five (5) election disputes. New elections were ordered in four (4) of those cases, and thus far there has been no judgment issued in the fifth (5<sup>th</sup>) case, which was a

recent dispute in a Long County case where I discovered double voting in the primary election. That double voting resulted in an investigation conducted by the Secretary of State's offices, that revealed approximately one thousand (1,000) double votes in approximately 120 counties.

8. When I processed an update to my copy of the Georgia Voter Database I received in August, I saw hundreds of thousands of voters who have name and address records which matched against USPS National Change of Address (NCOA) records. I have been seeing similar numbers for many years.

9. My understanding of the core issue is that every Secretary of State in the union is required to address those issues in accordance with provisions of the 1993 National Voter Registration Act.

10. For more information regarding the provisions of the act, specifically regarding NCOA and changes of address please visit the DOJ website for a summary which can be found at: <https://www.justice.gov/crt/national-voter-registration-act-1993-nvra>

11. The act permits a Secretary of State to mail a voter with an NCOA match at both their old and new addresses to obtain confirmation of the change of address, but as a practical matter, when that happens that request is often ignored.

12. The only other remedy available to a Secretary of State is to allow the voter's registration to age out of the system for inactivity, also as a proscribed by the act, which can often take years.

13. The relevant state laws governing residency requirements in Georgia can be found in OCGA 21-2-217 and 21-2-218.

14. Although our state laws on residency appear to be clear, there is obvious conflict between the effective implementation and administration of those laws and the 1993 National Voter Registration Act, as well as some existing Georgia case law which has only made the situation worse.

15. It is often argued in Georgia cases that evidence indicating a voter has in fact moved, even many years ago, is insufficient to prove that they intended to establish a new residence.

16. I have only seen judges act on those residency issues when we have succeeded in bringing people into court, have them put on the witness stand under oath, and they have admitted that they did in fact move with the intention of establishing a new residence.

17. The net effect of all that is our Georgia database always contains hundreds of thousands of people who have filed changes of address with the USPS, stating they have moved away from the addresses shown on their voter registration records, and that opens up a "Pandora's box" of potential issues.

18. I have just completed the NCOA processing on another copy of the voter database I obtained just this week.

19. It shows two hundred sixty-seven thousand two hundred and fifty-five (267,255) voters who have told the USPS they were moving to an address out of state.

20. Some of those no doubt will be students and people serving in the military who intend to return to Georgia, and they are of course lawfully permitted to vote.

21. I show fourteen thousand nine hundred and eighty (14,980) of those out of state movers voted in our November 3, 2020 General election.

22. The NCOA processing also revealed three hundred twelve thousand nine hundred and seventy-one voters (312,971) who moved within the state of Georgia.

23. Those who moved within a county can still vote in the county and update their registration as required.

24. However, of those who moved within the state, I am showing one hundred twenty-two thousand two hundred and thirty-one (122,231) voters who moved across county lines.

25. Of those I show forty thousand two hundred and seventy-nine (40,279) who moved across county lines more than thirty (30) days before the election but then cast a ballot in their old county of residence.

26. Again, if those were all temporary relocations, they are eligible, but I think it highly likely the vast majority are not temporary.

27. Georgia law says if these voters moved within thirty (30) days of the election, they were still eligible to vote in their previous county, so I am not counting any records with "Move Effective Dates" provided to the USPS past September 2020.

28. The law also states that if a voter moves more than thirty (30) days before the election, he or she may not lawfully cast a ballot in the county they previously resided in, which makes a great deal of sense.

29. If we think objectively about the reason for the law, a person who moves from county A to county B, but returns to county A to vote will then receive a ballot with election contests on it they have no lawful reason to cast a vote in.

30. So, outside of that thirty day grace period, or a temporary change of address, a person who does not permanently live in a county they cast vote in has no legal or moral right to cast a vote for sheriff, district attorney, county



commission, school board, or in a legislative, congressional, or other districts they no longer reside in.

31. In other words, it does not matter if the statewide races are the same, because the others are not, so a person who moves across county lines more than thirty (30) days from the election, and fails to update their registration as required by law, finds themselves in a very untenable position of their own making.

32. They are no longer legally allowed to cast a vote in their previous county, and at the same time are not properly registered to vote in their new county.

33. This unfortunately leaves them in a position where they cannot lawfully cast a ballot at all.

34. It appears to me we probably had tens of thousands of illegal votes cast in our last election. Worse, that has probably been happening for many, many years. I can only imagine how many close election contests have been affected by these issues

35. It is my hope that, if nothing else comes from the uproar surrounding our recent general election, we might all agree there is an obvious need for reform

36. First, the antiquated 1993 Voter Registration Act should be amended to create a National Voter Data Clearinghouse, which all states are required to participate in.

37. If a person is a New York snowbird, who spends their winters in Florida, they should still be permitted to vote in their home state.

38. However, the moment they declare Florida as their residence, and register to vote there, they should immediately be removed as a voter in New York.

39. Second, that Clearinghouse should be used to identify voters who are registered or voting in more than one state.

40. Third, I would also suggest we change the way the USPS gathers National Change of Address data and how that is used. If we simply allow them to ask people filing those notices to indicate if their address change is temporary or permanent, and then allow a Secretary of State to act on that information, it would go a long way towards keeping our voter rolls clean

41. Finally, I suggest we take steps before each election to notify voters with potential residency issues of the need to address any they legitimately may have so all eligible voters are casting lawful ballots for the elected officials who seek to represent them as public servants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30<sup>th</sup> day of November, 2020.



---

Mark Alan Davis

State of Georgia

County of Gwinnett

Appeared before me Kerstin Whitely, this 30<sup>th</sup> day of November 2020 and after being duly sworn, stated the forgoing statements are true and correct to the best of his knowledge and belief.

Mark Alan Davis

Mark Alan Davis

Kerstin Whitely

Notary Public

My commission expires 9/9/2024



# Exhibit E



**Kevin M. Moncla**  
824 Lake Grove Drive  
Little Elm, TX 75068  
469-588-7778  
[kmoncla@gmail.com](mailto:kmoncla@gmail.com)

June 6, 2022

Georgia State Election Board  
2 MLK Jr. Drive  
Suite 802 Floyd West Tower  
Atlanta, Georgia 30334

Mr. Brad Raffensperger  
Secretary of State  
214 State Capitol  
Atlanta, Georgia 30334

Mr. Matt Mashburn  
[mmashburn@georgia-elections.com](mailto:mmashburn@georgia-elections.com)

Mrs. Sara Tindall Ghazal  
[SaraGhazal.seb@gmail.com](mailto:SaraGhazal.seb@gmail.com)

Dr. Jan Johnston  
[JJohnstonMD.seb@gmail.com](mailto:JJohnstonMD.seb@gmail.com)

Mr. Edward Lindsey  
[Edwardlindsey.seb@gmail.com](mailto:Edwardlindsey.seb@gmail.com)

**RE: OFFICIAL COMPLAINT**

Board Members:

Please see the complaint below pertaining to a serious matter of great public importance requiring the immediate attention of the Georgia State Election Board.

**Official Complaint: 2022 Fulton County Primary Recertification**

The Fulton County Board of Registration and Elections (BRE) held an emergency meeting on Sunday, June 5<sup>th</sup>. The purpose of the meeting was to re-certify the primary election results.

It's important to note that this meeting was not noticed to the public and the live stream link normally provided on the Fulton County website for BRE meetings was unavailable. The only platform on which the live stream was found was on Facebook. Also, the meeting began one hour late and was not open to public comment.

All of these factors defy transparency, but when these accompany the impromptu recertification of election results on a Sunday afternoon, it is simply unacceptable.

The video link for the meeting is below and begins at the 59 minute-mark:

[\\*\\*Hearing at 59:00 mark\\*\\* Fulton Co GA \\*emergency\\* hearing at 2pm EST \(rumble.com\)](#)

BRE vice-chair Kathleen Ruth chairs the meeting. Teresa Crawford and Aaron Johnson are the only other board members present.

The Fulton County Election's Director, Nadine Williams, explained that the meeting was being held under emergency provisions because the Georgia Secretary of State required Fulton County to certify the May 24<sup>th</sup> primary election results before 9:00 AM on Monday, June 6<sup>th</sup>, and there was simply no other time in which a meeting could be held with a Quorum. Ms. Williams then says that Dominic Olomo (former Dominion employee) will explain the reason which necessitated the recertification of the results.

**Dominic Olomo (1:03:00)**

*On yesterday we found out that we had some precinct had some compact flash card. During election night we extract result files, images, and log files from CF card, from compact flash cards. We found out some precincts have discrepancies. Some CF cards were not pulling- some precincts were not pulling result files. Some were pulling images and log files. While some would have some images and log files, not result files. The result file is where we, you know, we use to do the tabulation. Import the result. The images inputs ballot images, The log file gives us the activity on the scanner, at the precinct level. So, we have those discrepancies, and it was just like, you know- know how to say- technical issue.*

**Dr. Ruth:**

*So this was a technical issue. Not that there were flash drives found- in -a... That's not what happened?*

**Dominic Olomo:**

*No*

**Dr. Ruth:**

*So all of the flash drives, right, were accounted for, for all precincts?*

**Dominic Olomo:**

*Correct*

**Dr. Ruth:**

*Um, this is a situation where the log file, so there is technical discrepancy where the result file and the log file was not reading together. Or was not reading the same?*

**Dominic Olomo:**

*No. So, on the CF card you can pull the log file. Log files, images and results file. Some pulled the images and the log file- not the results. Some pulled the results not the log files and the images. So in this discrepancy, they're like pulling one out of three, you're pulling two of three, you're pulling one of two.*

Mr. Olomo describes a discrepancy in the election results which he claims was caused by poll managers failure to save the correct election results files to the tabulator's compact flash card. Not only are Mr. Olomo's claims incorrect, but they are also impossible.

To understand the problem with Mr. Olomo's assertions, it is important to first understand the situation. Mr. Olomo is referencing the Dominion tabulators at each polling location. The specific tabulator he's referencing is the Dominion ImageCast Precinct (ICP) as shown below:



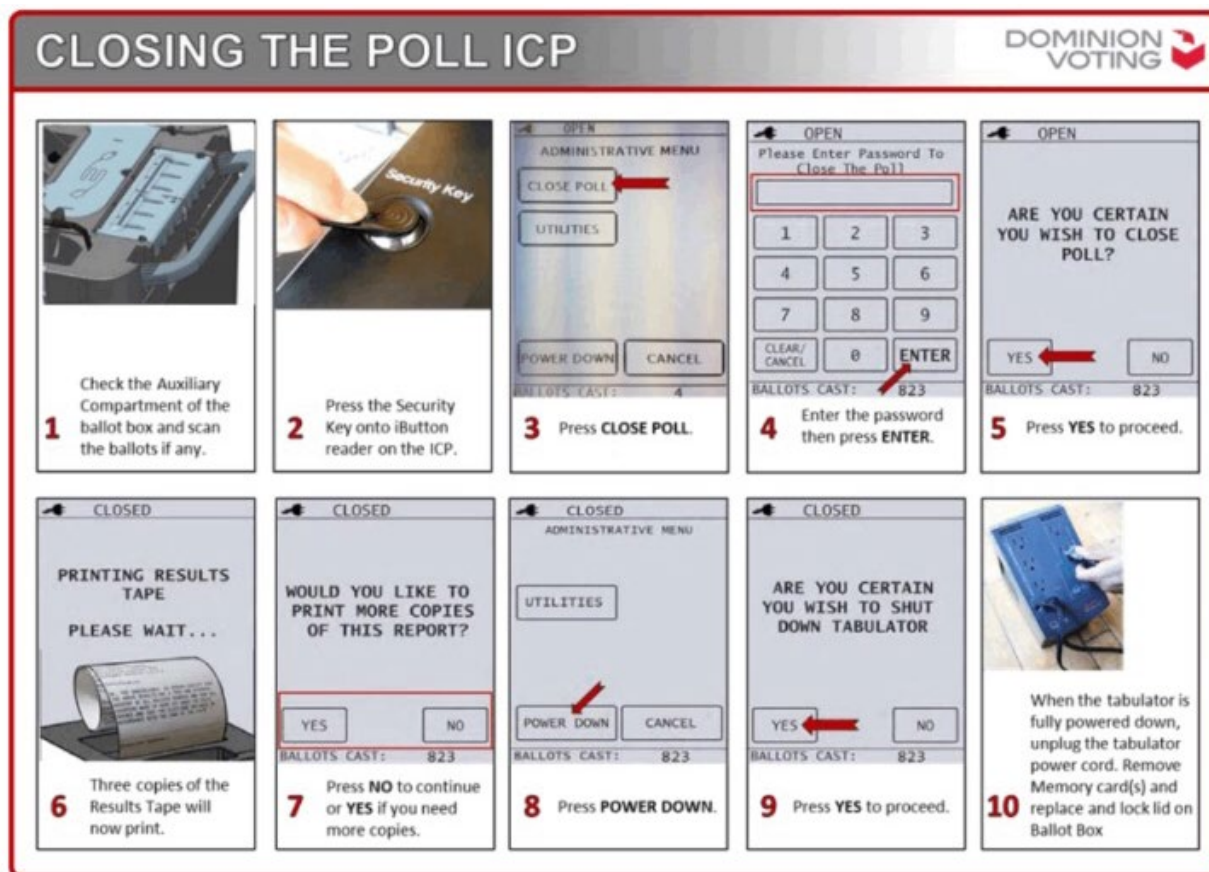
The Dominion ImageCast Precinct (hereinafter referred to as "ICP") stores ALL information on 2 compact flash cards, each of which is an identical copy of the other for redundancy. The ICP has no accessible internal hard drive or storage for election information besides the twin compact flash cards.

During an election as ballots are scanned, the ICP saves the electronic copy or ballot image to the compact flash cards. Also saved on the compact flash cards during the course of the election is a running tally for each candidate, for each race, or contest. Lastly, a system log, or "SLOG" which lists each tabulator activity is also stored on the compact flash cards.

In summary, the ballot images, vote count and system logs are all maintained/stored/saved on the compact flash cards and **ONLY** the compact flash cards for the duration of the election.

When the polls close at 7 pm on election day, the poll manager selects the option on the ICP to "close the poll". The ICP then counts the tallies for each contest (tabulates), prints the poll closing tapes and then automatically saves the results to the only place it can- to the compact flash cards.

From the Georgia Poll Manager Manual:



There is no action required by the poll manager to save any of the information to the compact flash cards as it is done so automatically. In fact, even if the poll manager failed to close the polls on the ICP, all of the election information would still exist on the card with the exception of the sum total for each contest (this essentially describes the Georgia Advance Voting process).

The following is an excerpt from the August 19, 2020 Declaration of Professor J. Alex Halderman- in which he describes the ICP compact flash cards (Attached hereto as "Exhibit A"):

6. After polls close, election workers remove the memory cards from every ICP scanner and return them to the county. At that point, the memory cards contain a digital image of each scan as well as the scanner's interpretation of the votes contained in the barcode. County workers use the Dominion EMS to retrieve data from the cards and prepare the final election results based on the barcode readings.

**Again, besides the 2 compact flash cards there is no other storage medium, memory, reservoir, or vessel, which holds the ballot images, vote count, results, log files or any other necessary election information.**

After the polls are closed and the tabulator tapes are printed, poll managers remove the compact flash cards from the ICP and transport them to the English Street Warehouse.

From the Georgia Poll Manager Manual ([Georgia Poll Worker Manual 2021.pdf \(ga.gov\)](#))

## **CLOSING THE POLLS**

### **Posting on the Door**

At the close of polls the following must be posted on the door:

- One set of tapes from the Polling Place Scanner
- Yellow copy of the Provisional Ballot Recap Sheet



### **Reminders**

- Remember that the memory cards, electors list, ballots, provisional bag and any other documents and supplies required of your county office
- Make sure you record what time the last voter voted on the recap sheet
- Remember to post the results tape and the yellow copy of the Provisional/Challenged Recap sheet on the polling place door
  - Even if the recap of the Provisional/Challenged is zero, you need to record that and post the yellow copy
- Remember to take the Poll worker memory card out of each Polling Place Scanner to return with recap sheets and other items as determined by your county office
- Make sure all machines are sealed at the end of the day
- Review checklist provided by the County Office for all items to be returned



After the compact flash cards are delivered, Mr. Olomo and one other Fulton County employee are responsible for uploading the results from each compact flash card to the Fulton County Election Management Server. After the compact flash cards from every polling location are uploaded, the election results are published to the Secretary of State.

Now that the voting equipment, function and relevant Fulton County election procedures have been established, let's review the reason for the election results discrepancy provided by Mr. Olomo.

**Mr. Olomo:**

*So, on the CF card you can pull the log file. Log files, images and results file. Some pulled the images and the log file- not the results. Some pulled the results not the log files and the images. So in this discrepancy, they're like pulling one out of three, you're pulling two of three, you're pulling one of two*

Because all election information exists only on the compact flash cards (no "pulling", pushing saving, or selecting required), the reason for the discrepancy or error in the election results that Mr. Olomo provided to the board is false.

Furthermore, Mr. Olomo is a former Dominion employee and has several years of experience with this very same equipment in this same location, which all but removes any possibility that he is mistaken or incompetent (The deposition of Mr. Dominic Olomo taken before the 2020 general election is attached hereto as "Exhibit B").

The meeting continues with Dr. Ruth asking Mr. Olomo how the problems necessitating recertification can be prevented in the future. Mr. Olomo explains that he has prepared an S.O.P. and a checklist for poll managers to make sure they get the right files. (As clearly established above, there is no procedure or process that can ensure what already happens automatically. All files are stored on the compact flash cards regardless of what the poll manager does or does not do.)

Dr. Ruth then proceeds to ask Mr. Olomo about the size of the discrepancy between that which was previously certified and what was being recertified. She specifically asks about the change or number of vote count difference between the two, or how many votes were being "added".

Mr. Olomo says that he can get that information to her at a later time.

**The Fulton County Board of Registration and Elections then voted to re-certify the election results without knowing the totals they were certifying nor the difference between what they had already certified and what they were recertifying.**

Certification is defined as the act of ensuring something is genuine or authentic. The Fulton County Board of Registration and Elections literally certified election results without knowing what they were. This bears repeating, louder.

**THE FULTON COUNTY BOARD OF REGISTRATION AND ELECTIONS LITERALLY CERTIFIED ELECTION RESULTS WITHOUT KNOWING WHAT THE ELECTION RESULTS WERE THAT THEY WERE CERTIFYING.**

Perhaps the obvious needs to be explained. Election results can not be verified without knowing what the results are. This is analogous to signing loan papers to purchase a car without knowing how much the car or the loan costs.

In further affirmation as to the ludicrous state of affairs in Fulton County, one of the board members actually takes issue with a comment by Dr. Ruth regarding the importance of restoring confidence in Fulton County elections. Aaron Johnson tells Dr. Ruth that he prefers the word “maintain” instead of “restore”. He says that it is proper to say “it’s important that we ***maintain*** confidence in Fulton County elections” as opposed to restore confidence because restore suggests that public confidence has been lost. Immediately thereafter he votes to recertify unknown election results changed by inarguably false reasons.

The certification of election results is an official act, duty and very serious responsibility. One which obviously and inherently requires command of the facts, understanding of the process and due diligence to authenticate and reconcile the results. All impossible without having the exact numbers, much less no numbers at all. Because proper certification could not have, and therefore did not occur, I seek the following true and proper remedy:

I ask that the Georgia State Election Board immediately call for an emergency meeting and vote to reject the Fulton County certification, followed by a proper SEB verification and certification of the Fulton County election results.

I also ask that the SEB open an investigation to find the true cause of any election results discrepancy and the reasons behind Mr. Olomo’s false statements to the Fulton County BRE. Considering that Mr. Olomo is also responsible for the UN-CERTIFIED poll tapes representing over 311,000 votes for the 2020 general election as detailed in a previously filed complaint, I ask that the SEB place Mr. Olomo on paid leave pending the outcome of the investigation.

Electronic file provided via email with original submitted via U.S. Certified Mail.

Respectfully Submitted this 6<sup>th</sup> day of June, 2022,



Kevin M. Moncla

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September 12, 2022

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Ex officio:  
Mr. Brad Raffensperger  
Secretary of State  
214 State Capitol  
Atlanta, Georgia 30334

## **RE: OFFICIAL COMPLAINT**

Board Members:

We are submitting this official complaint regarding the circumstances surrounding the official certification of Georgia's electronic voting system by the Elections Assistance Commission (hereinafter "EAC"). Our investigation has uncovered evidence which calls in to question, not only the validity of Georgia's voting system certification, but the accreditation of the Voting System Testing Laboratory, and the credibility of the EAC itself.

While the actions and deficiencies of the EAC are beyond the purview of this board, Georgia law required the purchase of an EAC certified electronic voting system.<sup>1</sup>

When the Georgia State legislature passed such a requirement, they did so with the implicit expectation that such an EAC certified voting system would meet standards in accordance with federal law.

Unfortunately, that certification is but an empty shell as the EAC's outdated voting system guidelines, requirements, rules, and methods of measuring compliance as promulgated by federal law have been effectively ignored, circumvented, and dismissed. The EAC has failed to maintain oversight and accreditation of the Voting System Testing Labs as required by the Help America Vote Act (HAVA).<sup>2</sup> Efforts to conceal this fact have only magnified the damage, perpetuated a fraud upon the American people, and prevented correction or

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<sup>1</sup> Ga. Code § 21-2-300 ("(3) The state shall furnish a uniform system of electronic ballot markers and ballot scanners for use in each county as soon as possible. Such equipment shall be certified by the United States Election Assistance Commission prior to purchase, lease, or acquisition.")

<sup>2</sup> [Help America Vote Act | U.S. Election Assistance Commission](#)

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remedy. Specifically:

1. Pro V&V's EAC Voting System Testing Lab Accreditation expired in 2017.
2. EAC officials have falsely misrepresented the accreditation status of Pro V&V and have gone to extraordinary lengths to conceal the fact that Pro V&V's accreditation was expired for an extended period of time.
  - A. Records and analysis strongly suggest that the EAC fabricated documents on behalf of Pro V&V then posted those documents on the EAC website. Seemingly this was done in an effort to make it appear as though the required documents had been timely submitted.
  - B. Following the 2020 General Election, the EAC falsely claimed that the reason Pro V&V's accreditation certificate(s) had not been issued was because of:
    1. Delays caused by COVID-19
    2. Administrative Error
    3. Accreditation wasn't Revoked
3. Georgia's current voting system was not certified in accordance with the Help America Vote Act. The voting system Georgia purchased was not tested by an EAC accredited Voting System Testing Lab as required thereby rendering the EAC certification invalid based upon the established requirements.

## **BACKGROUND**

The issues presented in this complaint are governed by the rules and regulations of the Election Assistance Commission (EAC). The EAC's authority is derived from the Help America Vote Act (HAVA) which was passed by the U.S. Congress in 2002.<sup>3</sup> HAVA requires that the EAC provide for the accreditation and revocation of accreditation of independent, non-federal laboratories qualified to test voting systems to Federal standards.<sup>4</sup> The EAC is also charged with establishing those Federal Standards.<sup>5</sup>

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<sup>3</sup> HAVA is codified at 52 U.S.C. 20901 to 21145

<sup>4</sup> Help America Vote Act (HAVA) of 2002 ([42 U.S.C. 15371\(b\)](#)) requires that the EAC provide for the accreditation and revocation of accreditation of independent, non-federal laboratories qualified to test voting systems to Federal standards.

<sup>5</sup> Section 311 of the Help America Vote Act of 2002 (HAVA) requires the U.S. Election Assistance Commission (EAC) to periodically adopt standards for voting systems in the form of Voluntary Voting System Guidelines

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From the EAC's website:

*HAVA creates new mandatory minimum standards for states to follow in several key areas of election administration. The law provides funding to help states meet these new standards, replace voting systems and improve election administration. HAVA also established the Election Assistance Commission (EAC) to assist the states regarding HAVA compliance and to distribute HAVA funds to the states. EAC is also charged with creating voting system guidelines and operating the federal government's first voting system certification program.*

The EAC is responsible for creating voting system testing guidelines which are standards and rules that voting machines must comply with to be certified. The EAC accredits third-party companies to test whether voting systems meet the requirements of the voting system guidelines. These companies are called Voting System Testing Labs (VSTLs). Although this complaint centers on the accreditation of one VSTL, it's important to understand the following facts:

1. **Every** voting machine certified by the EAC used in the United States today has not been tested beyond a 2005 standard (Pre-iPhone).<sup>6</sup>
2. Voting system certification does not include testing for penetration, intrusion or system manipulation (doesn't test if the machines can be used to cheat).<sup>7</sup>
3. The Voting System Testing Labs (VSTLs) responsible for testing the voting systems for the EAC are not paid by the EAC but by the voting system manufacturers (Dominion, ES&S, Hart); therefore, an inherent conflict of interest exists.<sup>8</sup>
4. The VSTLs are not qualified nor are they accredited by the EAC to perform any type of forensic audits of the voting systems like those they were paid to perform in many locales following the 2020 general election (Maricopa, Georgia, Michigan, etc.).<sup>9</sup>
5. There are only 2 VSTLs currently recognized by the EAC; Pro V&V and SLI Compliance.<sup>10</sup>

## **1. PRO V&V'S ACCREDITATION EXPIRED IN 2017**

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<sup>6</sup> [Certified Voting Systems | U.S. Election Assistance Commission \(eac.gov\)](https://www.eac.gov/certified-voting-systems)

<sup>7</sup> [Voluntary Voting System Guidelines | U.S. Election Assistance Commission \(eac.gov\)](https://www.eac.gov/voluntary-voting-system-guidelines)

<sup>8</sup> [Frequently Asked Questions | U.S. Election Assistance Commission \(eac.gov\)](https://www.eac.gov/frequently-asked-questions)

<sup>9</sup> [Chain of Custody Best Practices \(eac.gov\)](https://www.eac.gov/chain-of-custody-best-practices)

<sup>10</sup> [Voting System Test Laboratories \(VSTL\) | U.S. Election Assistance Commission \(eac.gov\)](https://www.eac.gov/voting-system-test-laboratories)



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The VSTL Program Manual<sup>11</sup> explicitly states:

*3.8. Expiration and Renewal of Accreditation. A grant of accreditation is valid for a period not to exceed two years. A VSTL's accreditation expires on the date annotated on the Certificate of Accreditation. VSTLs in good standing shall renew their accreditation by submitting an application package to the Program Director, consistent with the procedures of Section 3.4 of this Chapter, no earlier than 60 days before the accreditation expiration date and no later than 30 days before that date. Laboratories that timely file the renewal application package shall retain their accreditation while the review and processing of their application is pending.*

The fact is that Pro V&V was not in good standing. The first Certificate of Accreditation issued to Pro V&V is below:



The Certificate of Accreditation clearly delineates the beginning date of February 24, 2015 and is “Effective Through” February 24, 2017. There are simply no submissions by Pro V&V as required to renew their accreditation (save those filed in 2015) until after the 2020 general election. The fact is that Pro V&V’s accreditation expired on February 24, 2017. Even so, Pro V&V continued as though they remained accredited. It was during this time when Pro V&V tested Dominion’s Democracy Suite 5.5A(G), which was subsequently and erroneously certified by the EAC.

## 2. EAC FALSELY MISREPRESENTED PRO V&V’S ACCREDITATION

<sup>11</sup> VSTL Program Manual, Version 1, effective July 2008, and Version 2, effective May 2015, approved by vote of the EAC Commission

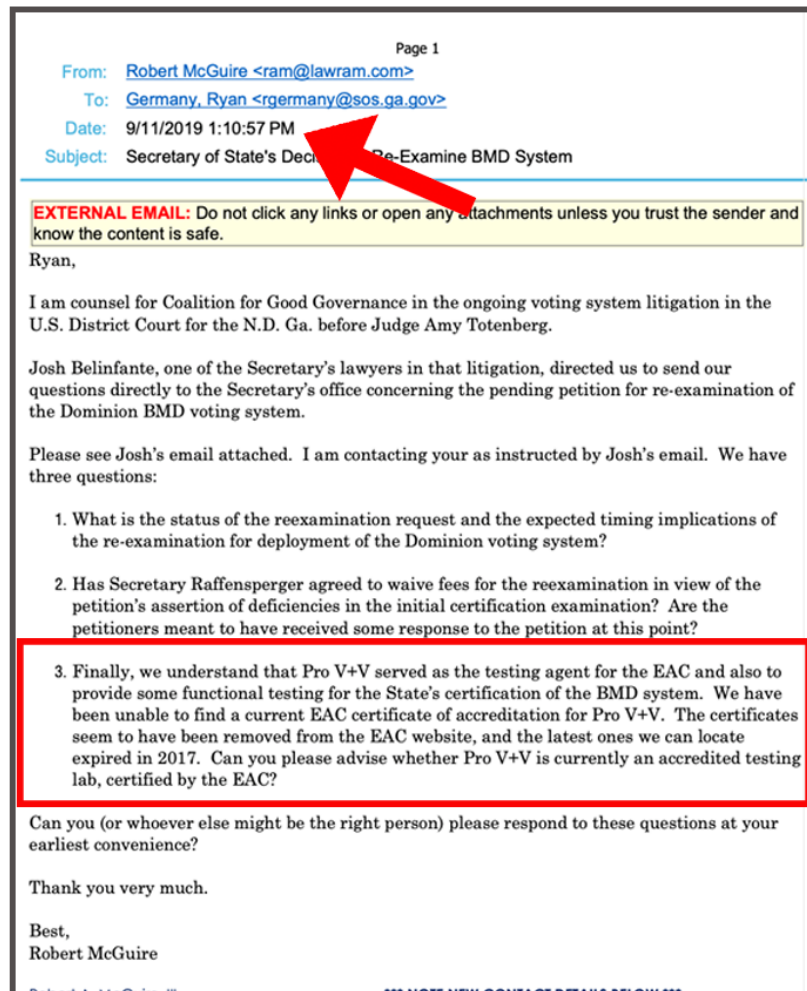
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Through a series of fraudulent acts and extraordinary statements, the EAC has engaged in a practice of subterfuge and deceit to conceal the fact that Pro V&V was not an accredited laboratory for an extended period of time.

#### A. FABRICATION OF DOCUMENTS

On September 11, 2019, an attorney representing the Coalition for Good Governance in a pending federal lawsuit (Curling v. Raffensperger) sent an email to Ryan Germany, General Counsel for the Georgia Secretary of State. The email inquired about the accreditation status of Pro V&V who had tested Georgia's Dominion Democracy Suite 5.5A(G) voting system that the EAC had subsequently certified. Specifically, the email states in part:

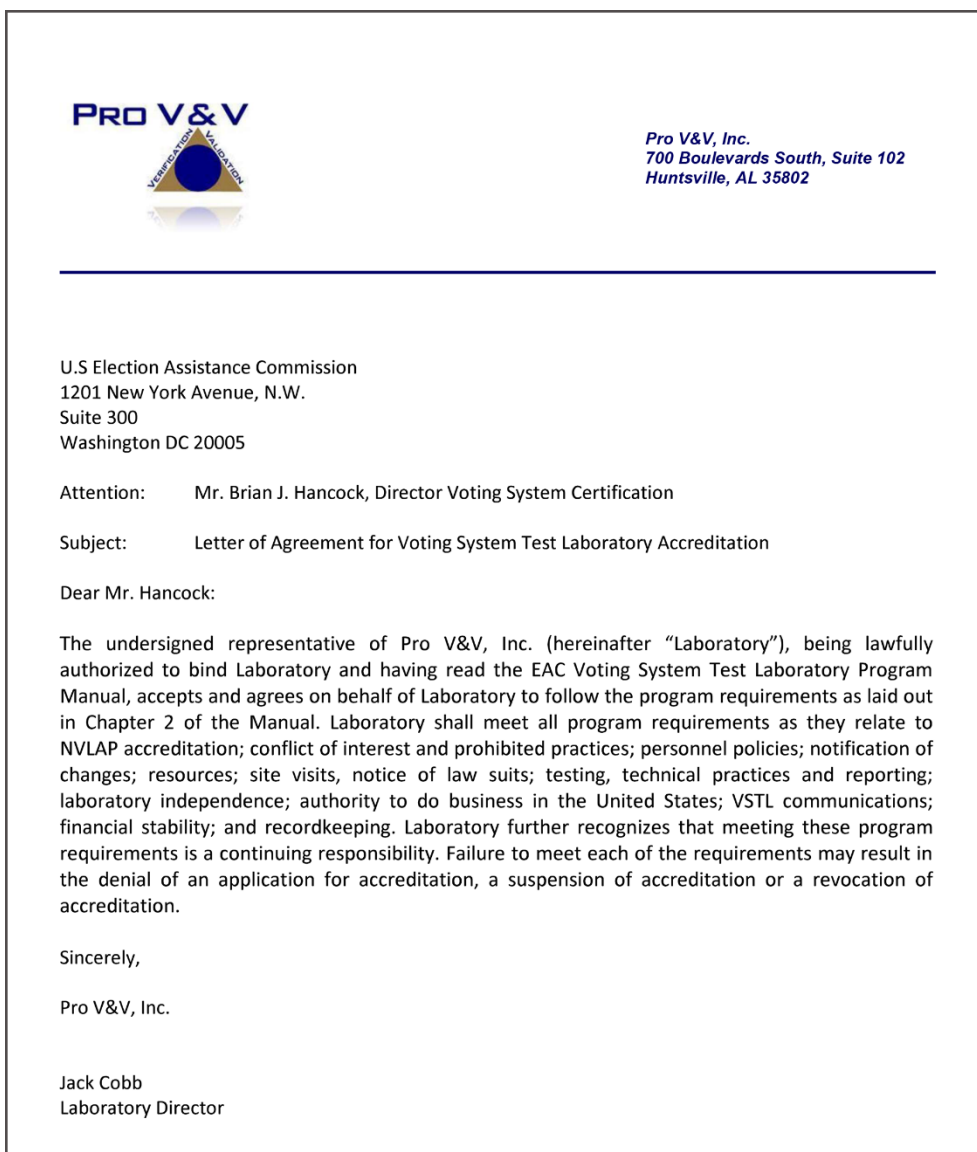
*"3. Finally, we understand that Pro V+V served as the testing agent for the EAC and also to provide some functional testing for the State's certification of the BMD system. We have been unable to find a current EAC certificate of accreditation for Pro V+V. The certificates seem to have been removed from the EAC website, and the latest ones we can locate expired in 2017. Can you please advise whether Pro V+V is an accredited testing lab, certified by the EAC?"*



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As Mr. McGuire states in the email above, the EAC website showed only one certificate of accreditation for Pro V&V which was issued in February of 2015 and expired in February of 2017.

A review of Pro V&V's records posted on the EAC's website revealed a document which was not posted until *after* the inquiry noted above. Complainants downloaded the document with the filename "Pro V&V Letter of Agreement.pdf" which is posted below (An electronic copy is also attached for your independent review):



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Pro V&V's "Letter of Agreement" was addressed to Mr. Brian J. Hancock, the former Director of Voting System Certification for the EAC. Interestingly, there is no date nor signature which the rules adopted by the EAC specifically require:

***Submission of Documents.** Any documents submitted pursuant to the requirements of this Manual shall be submitted:*

*with a proper signature when required by this Manual. Documents that require an authorized signature may be signed with an electronic representation or image of the signature of an authorized management representative.*

*3.4.2. Letter of Agreement. The applicant laboratory must submit a signed letter of agreement as part of its application. To that end, applicant laboratories are required to submit a Letter of Application requesting accreditation. The letter shall be addressed to the Testing and Certification Program Director and attach (in either hard copy or on CD/DVD) (1) all required information and documentation; (2) a signed letter of agreement; and (3) a signed certification of conditions and practices.*

Due to the suspect circumstances surrounding the document, we decided to view the file's metadata. This shows the document posted on the EAC's website was created six (6) days after the email seeking the status of Pro V&V's accreditation.



What's more, the Letter of Agreement that Mr. Lovato seemingly created on September 17, 2019, was addressed to Mr. Brian J. Hancock. The problem is that Mr. Hancock had retired in February of 2019, or nearly seven months before the letter was created.

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Additionally, the file's metadata shows that the document was not authored by Jack Cobb of Pro V&V, but by the EAC's own Testing and Certification Director, Jerome Lovato. Perhaps there's a good explanation, or at least a plausible one; however, there are other problems. When the document was opened in Photoshop, it revealed that the letterhead was not one image as one would expect, but images that had been cut and pasted:

Document Header from the Letter of Agreement added by Jerome Lovato as shown in Adobe Photoshop:



Document Header from the 2020 Letter of Agreement as shown in Adobe Photoshop using the same process:



If the Letter of Agreement was in-fact created by Pro V&V, they didn't include their phone number, email, and misspelled their own address on their "letterhead":



Also, the EAC's address changed from that of the letter (1201 New York Ave, DC) to 1335 East West Highway, MD on October 22, 2013, or before the date to which the letter was attributed.



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No matter the provenance of the Letter of Agreement, without a date or signature it fails to meet any acceptable standard. The same is acknowledged by the fact that the document was not publicly posted as required until 6 days after the email cited above inquiring about Pro V&V's accreditation status. Lastly, the EAC never issued a Certificate of Accreditation for 2017 when Pro V&V's 2015 accreditation expired.

## **B. EAC MISREPRESENTED STATUS OF PRO V&V**

After the 2020 General election the EAC went so far as to surreptitiously cover-up the fact that Pro V&V was not accredited and had not been for years. Pro V&V was granted EAC accreditation as a Voting Systems Testing Laboratory (VSTL) on February 24, 2015 and was effective through February 24, 2017. From the Voting System Test Laboratory Program Manual, Version 2.0

*3.8 Expiration and Renewal of Accreditation. A grant of accreditation is valid for a period not to exceed two years. A VSTL's accreditation expires on the date annotated on the Certificate of Accreditation. VSTLs in good standing shall renew their accreditation by submitting an application package to the Program Director, consistent with the procedures of Section 3.4 of this Chapter, no earlier than 60 days before the accreditation expiration date and no later than 30 days before that date. Laboratories that timely file the renewal application package shall retain their accreditation while the review and processing of their application is pending. VSTLs in good standing shall also retain their accreditation should circumstances leave the EAC without a quorum to conduct the vote required under Section 3.5.5.*

There is no record whatsoever of Pro V&V renewing their accreditation in 2017, despite the requirement that all associated documents *shall* be posted on the EAC's website:

*3.6.2. Post Information on Web Site. The Program Director shall make information pertaining to each accredited laboratory available to the public on EAC's Web site. This information shall include (but is not limited to):*

- 3.6.2.1. NIST's Recommendation Letter;*
- 3.6.2.2. The VSTL's Letter of Agreement;*
- 3.6.2.3. The VSTL's Certification of Conditions and Practices;*
- 3.6.2.4. The Commissioner's Decision on Accreditation; and 3.6.2.5. The Certificate of Accreditation.*

There is also no record of Pro V&V renewing their accreditation in 2019. It isn't until after the 2020 general election that Pro V&V's accreditation is renewed.

## **1. PANDEMIC EXCUSE**

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On January 27, 2021, Jerome Lovato of the EAC issued the following memo attempting to use the pandemic somehow as cause for Pro V&V's "questionable" accreditation status:



U.S. ELECTION ASSISTANCE COMMISSION  
633 3rd St. NW, Suite 200  
Washington, DC 20001

**FROM:** Jerome Lovato, Voting System Testing and Certification Director  
**SUBJECT:** Pro V&V EAC VSTL Accreditation  
**DATE:** 1/27/2021

Pro V&V has completed all requirements to remain in good standing with the EAC's Testing and Certification program per section 3.8 of the Voting System Test Laboratory Manual, version 2.0:

**Expiration and Renewal of Accreditation.** A grant of accreditation is valid for a period not to exceed two years. A VSTL's accreditation expires on the date annotated on the Certificate of Accreditation. VSTLs in good standing shall renew their accreditation by submitting an application package to the Program Director, consistent with the procedures of Section 3.4 of this Chapter, no earlier than 60 days before the accreditation expiration date and no later than 30 days before that date. Laboratories that timely file the renewal application package shall retain their accreditation while the review and processing of their application is pending. VSTLs in good standing shall also retain their accreditation should circumstances leave the EAC without a quorum to conduct the vote required under Section 3.5.5.

Due to the outstanding circumstances posed by COVID-19, the renewal process for EAC laboratories has been delayed for an extended period. While this process continues, Pro V&V retains its EAC VSTL accreditation.

Lovato states:

*Pro V&V has completed all requirements to remain in good standing with the EAC's Testing and Certification program per section 3.8 of the Voting System Test Laboratory Manual, version 2.0:*

The statement above is false by any metric. Lovato would have us believe that Pro V&V's accreditation was somehow current despite the required submissions and Certificates of Accreditation missing from the EAC's website (The EAC is required to post the documents). Then Lovato claims that the pandemic is the cause of any accreditation deficiency:

*Due to the outstanding circumstances posed by COVID-19, the renewal process for EAC laboratories has been delayed for an extended period. While this process continues, Pro V&V retains its EAC VSTL accreditation.*

Interestingly, Lovato specifically names Pro V&V and doesn't mention the other VSTL, SLI

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Compliance. Furthermore, the EAC's pandemic excuse is refuted simply by referencing a calendar. Pro V&V's accreditation expired in February of 2017, three years before the pandemic. Even if we were to accept the cryptic, undated and unsigned Letter of Agreement of questionable origin and attribute it to 2017, the accreditation would have expired in 2019, a year before COVID-19 was deemed a national emergency.

## 2. CLERICAL ERROR EXCUSE

The pandemic excuse is not retroactive to a time before the pandemic, a fact which was evidently brought to the attention of the EAC and what precipitated the release of the next memo (attached hereto as "Exhibit C") which states:

*Due to administrative error during 2017-2019, the EAC did not issue an updated certificate to Pro V&V causing confusion with some people concerning their good standing status. Even though the EAC failed to reissue the certificate, Pro V&V's audit was completed in 2018 and again in early 2021 as the scheduled audit of Pro V&V in 2020 was postponed due to COVID-19 travel restrictions. Despite the challenges outlined above, throughout this period, Pro V&V and SLI Compliance remained in good standing with the requirements of our program and retained their accreditation. In addition, the EAC has placed appropriate procedures and qualified staff to oversee this aspect of the program ensuring the continued quality monitoring of the Testing and Certification program is robust and in place.*

Again, even if we were to accept the highly suspect Letter of Agreement and attribute it to 2017, along with the EAC's explanation of administrative error in failing to issue a Certificate of Accreditation in 2017, the accreditation would have expired in February of 2019 without exception (3.8. *Expiration and Renewal of Accreditation. A grant of accreditation is valid for a period not to exceed two years*). The EAC conveniently ignores the irrefutable fact that Pro V&V is lacking **two** Certificates for Accreditation- one for 2017 and another for 2019. Also missing from the record and the EAC's website are Pro V&V's filings for accreditation renewal for both 2017 and 2019.

## 3. REVOCATION EXCUSE

In the same memo cited above, Mr. Lovato disingenuously attempts to address the concerns of *expiration* with the prospect of *revocation*. From the memo:

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*The VSTL accreditation does not get revoked unless the commission votes to revoke accreditation; and by that same token, EAC generated certificates or lack thereof do not determine the validity of a VSTL's accreditation status.*

*Pro V&V was accredited by the EAC on February 24, 2015, and SLI Compliance was accredited by the EAC on February 28, 2007. Federal law provides that EAC accreditation of a voting system test laboratory cannot be revoked unless the EAC Commissioners vote to revoke the accreditation: "The accreditation of a laboratory for purposes of this section may not be revoked unless the revocation is approved by a vote of the Commission." 52 U.S. Code § 20971(c)(2). The EAC has never voted to revoke the accreditation of Pro V&V. Pro V&V has undergone continuing accreditation assessments and had new accreditation certificate issued on February 1, 2021.*

The EAC raises the matter of revocation and that such action requires a "vote of the Commission". It goes on to say "*The EAC has never voted to revoke the accreditation of Pro V&V*". The EAC is conflating the matters of *revocation* with that of *expiration*. Suggesting that simply because the Commission has never voted to revoke Pro V&V's accreditation, then it remains active by default. The prospect defies logic. The term "Expired" is defined as:

***Expired-*** *cease to be valid after a fixed period of time.*

The term "Revocation" is defined as:

***Revoked-*** *put an end to the validity or operation of.*

Expiration is automatic, as in when the term is up. Revocation requires an affirmative act to end something. Like a driver's license can be expired or revoked, the two are different and have different causes and meanings. A driver's license can be expired and therefore invalid without being revoked. Mr. Lovato's assertion is analogous to claiming that your expired driver's license is valid simply because it's not revoked. This rationale is ludicrous. Furthermore, to accept such a prospect would require ignoring the clearly defined prescription of time "...not to exceed two years."

The bright lines of the rules regarding accreditation renewal and expiration are clear; therefore, this is an effort of either deception or ignorance. Considering that Mr. Lovato cites the plain language detailing expiration in his January 21, 2021 memo (above), the possibility of ignorance is removed.

Also removed is a page from the EAC's website with the heading, "Labs with Expired Accreditation" that can be found archived here:

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The fact that the category, “Labs with Expired Accreditation” existed on the EAC’s website is damning to Lovato’s assertion as it establishes the EAC’s own acknowledgement that VSTL accreditations do expire *without* revocation. The removal of the page suggests that the EAC realized the same and acted to conceal that which would lift the thin veil of plausible deniability.

What’s more, we know from the email to the Georgia Secretary of State’s general counsel that the Secretary of State and the EAC were both made aware of Pro V&V’s long-expired accreditation over a year before the 2020 general election. Instead of properly addressing the deficiency at the time, the EAC presumably elected to create a fraudulent record on behalf of Pro V&V. Regardless, they knowingly chose to fraudulently misrepresent Pro V&V’s accreditation status and attempted to cover-up the facts with a litany of excuses that just don’t hold water.

### **3. GEORGIA’S VOTING SYSTEM WAS NEVER PROPERLY CERTIFIED**

Pro V&V performed the testing on Georgia’s Dominion Democracy Suite 5.5A(G) system and submitted the final report to the EAC on August 7, 2019. Because Pro V&V’s VSTL accreditation expired in February of 2017 (or February of 2019 if we accept the EAC’s flawed excuses) and system certification requires testing by an EAC accredited VSTL, the EAC certification of Georgia’s voting system is not valid.

#### **SUMMARY**

As we mark the EAC’s 20<sup>th</sup> year, we must acknowledge that the EAC has failed to develop and maintain voting system testing guidelines, failed to oversee the accreditation of testing labs, and failed to test our country’s voting systems to a remotely reasonable standard. The fact is that EAC has miserably failed to perform not only its core mission, but all missions for its entire existence.

The actions of the EAC as detailed herein extend far beyond mere *failure*. The EAC has fabricated a fraudulent record for Pro V&V and has repeatedly, knowingly, and intentionally misrepresented the expired accreditation status of a Voting Systems Testing Laboratory to the American people. The EAC’s deceptive practices have fostered a false sense of security and materially violated their responsibilities under the HAVA in both letter and spirit of the law.

The inherit standard of any established institution or industry does not exist with voting systems in the United States. There is no benchmark, no independent method of testing, no oversight, and therefore there is no alternative but for the States to perform their own due



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diligence in testing our voting systems.

Wherefore, the Georgia State Election Board must immediately suspend use of the Dominion voting systems until a thorough, review by a panel of independent experts can be performed.

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# Exhibit F



## Georgia's 2022 General Election Validity Scorecard

### ★ 1. Were the voter rolls accurate, as required by the National Voter Registration Act of 1993?

Ineligible or Uncertain Registration Type	Number of Instances*
Illegal duplicate registrations	77,190
Invalid addresses found	61,251
Age discrepant registration—over 105 or under 17	849
Backdated registrations	28,335
Invalid registration date (99999999 or 5201011)	47
Invalid names	205
Sunday registration	201,195
January 1 registration	82,763
Inactive and no contact for 8+ years	92,024
<b>TOTAL APPARENT REGISTRATION VIOLATIONS:</b>	<b>543,859</b>

### ★ 2. Were the votes counted from eligible voters, as required by the US Constitution?

Ineligible or Uncertain Registration Type that Voted in 2022 GE	Votes cast in 2022 GE**
Illegal duplicates	36,327
Invalid address	11,269
Age discrepant – over 105 or under 18	540
Backdated registration	7,305
Invalid registration date (99999999 or 5201011)	20
Invalid names	58
Sunday registration	110,729
January 1 registration	71,057
Inactive and no contact for 8+ years	181
Registration after cutoff date (10/10/2022) and voted	14,399
<b>TOTAL APPARENT VOTING VIOLATIONS:</b>	<b>251,885</b>
<b>UNIQUE VOTES IMPACTED BY APPARENT VOTING VIOLATIONS:</b>	<b>239,178</b>

### ★ 3. Was the number of votes counted equal to the number of voters who voted?

Official Source	Reported Total by Official Source
GA SOS Official Results of 2022 GE certification (January 8, 2023)	<b>Votes counted: 3,924,926</b>
GA SWVRD raw data, official federal document (January 9, 2023)	<b>Voters who voted: 3,959,230</b>
<b>DIFFERENCE (fewer votes counted than voters who voted):</b>	<b>34,304</b>

### ★ 4. Was the number of ballots in error valid according to the Help America Vote Act of 2002?

Apparent voting violations in the 2022 GE according to NV SWVRD raw data	239,178
Allowable machine error rate is 1/10,000,000 ballot positions or 1/125,000 ballots	32
<b>Unresolved vote errors: Provable accuracy fails to meet any protective legal standard</b>	<b>239,146</b>

*“Congress seeks. . . to guard the election of members of Congress against any possible unfairness by compelling, under its pains and penalties, everyone concerned in holding the election to a strict and scrupulous observance of every duty devolved upon him while so engaged. . . . The evil intent consists in disobedience to the law.” —In re Coy, 127 U.S. 731 (1888)*

\*Voter rolls of 11/23/2022 as purchased from the Georgia SOS.

\*\*Voter history file for 2022 as downloaded from the Georgia SOS website.



# Exhibit G

## Section 1

### Illegal Duplicate Registrations - Section 1

*Since each voter is allowed only one vote, the voter must be listed only once. The duplicate registrations found do not distinguish which registration is valid.*

**2022 Georgia Code<sup>[L]</sup><sub>SEP</sub> Title 21 - Elections<sup>[L]</sup><sub>SEP</sub> Chapter 2 - Elections and Primaries  
Generally<sup>[L]</sup><sub>SEP</sub> Article 6 - Registration of Voters<sup>[L]</sup><sub>SEP</sub> § 21-2-211. List of Registered Electors;  
Provision of Equipment to Access and Utilize List  
Universal Citation: [GA Code § 21-2-211 \(2022\)](#)**

**2022 Georgia Code<sup>[L]</sup><sub>SEP</sub> Title 21 - Elections<sup>[L]</sup><sub>SEP</sub> Chapter 2 - Elections and Primaries  
Generally<sup>[L]</sup><sub>SEP</sub> Article 15 - Miscellaneous Offenses<sup>[L]</sup><sub>SEP</sub> § 21-2-572. Repeat Voting in Same  
Primary or Election**

**Universal Citation: [GA Code § 21-2-572 \(2022\)](#)**

USA-GA1-01-01-DUP-dupes on first, middle, last + YOB - diff reg#  
by SB

Count: 77190

Duplicate Registrations - Same Person, first, middle, last name & YOB - new REGISTRATION\_NUMBER

This query creates two temporary tables from the same voter roll (11/23/2022), adding a name hash of first, middle last name and YOB.

The name hash is used to identify the same voter with a different registration number. Finally, only the lower of the two numbers is selected, to prevent double listing of a voter.

### Invalid Addresses Found - Section 1

*This represents false information, and the registration violates S.216.a.1, "The residence of any person shall be that place in which such person's habitation is fixed" S217.a.1 rendering the registrant unqualified to vote. If the falsehood was intentional, it is also a violation of S.562.a.*

**2022 Georgia Code  
Title 21 - Elections  
Chapter 2 - Elections and Primaries Generally  
Article 6 - Registration of Voters  
§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From  
List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of  
Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons  
and Deceased Persons Databases**

**Universal Citation: [GA Code § 21-2-216 \(2022\)](#)**

**2022 Georgia Code**  
**Title 21 - Elections**  
**Chapter 2 - Elections and Primaries Generally**  
**Article 6 - Registration of Voters**  
**§ 21-2-217. Rules for Determining Residence**

**Universal Citation:** [GA Code § 21-2-217 \(2022\)](#)

**2022 Georgia Code**  
**Title 21 - Elections**  
**Chapter 2 - Elections and Primaries Generally**  
**Article 15 - Miscellaneous Offenses**  
**§ 21-2-562. Fraudulent Entries; Unlawful Alteration or Destruction of Entries; Unlawful Removal of Documents; Neglect or Refusal to Deliver Documents**

**Universal Citation:** [GA Code § 21-2-562 \(2022\)](#)

USA-GA1-02-01-ADR-Questionable Addresses - Invalid or Redacted\_Address\_Registrations  
BJH Records Returned: 2757

This query returns entries that have no residence house NUMBER  
or no residence street name or with the residence street name of 'MISSING ADDRESS'  
or no city  
or no zip code  
or a place holder zip code of '99999'  
or invalid or control characters in any of the address fields

USA-GA1-02-02-ADR-ILLEGAL Registrations-PO Box as Residence address  
BJH Records Returned: 1455  
It is illegal to register in Georgia using a PO Box  
Residence address must be where you live.

These registrations are using a Post Office or Mail Box Business as their residential addresses

This query select all the entries in the 11-23-2022 voter roll that are registered using an address stored in the GA\_USPS table.

GA\_USPS table compiled by screenscrapes from <https://postofficepage.com/unitedstates/georgia>  
<https://locations.theupsstore.com/ga>

WEB LINK column links to Google Maps view of the residence address of the registration

USA-GA1-02-03-ADR-Invalid Address - Multi Unit addresses with No Unit Number  
BJH Records Returned 57,039  
Registrants that live at a multi unit address but have no unit number in registration

Query Described:  
SUBQUERY ADDRESSES compiles a list of distinct addresses in the 11-23-2022 voter roll.  
This is based on a string that combines the house number-street name-city and zip code  
of the registrat's residence address on the voter roll (with spaces removed)

SUBQUERY HOW\_MANY returns a count of how many registrants are registered at those distinct addresses compiled in the ADDRESSES subquery AND have at least 1 registration with a unit number.

MU\_ADDRESSES uses an arbitrary number of at least 10 registrations from the HOW\_MANY subquery to establish that address as a multi unit address. The addresses returned by the MU\_ADDRESSES buswuary will be all the addresses in the voter roll that have at least 10 registrations that use that address as their residential address and have at least one of them declaring that they live in a separate and distinct UNIT at that address.

THE MAIN QUERY then returns all the registrations at the addresses returned by the MU\_ADDRESSES subquery that have NO unit number declared. These are assumed to be undeliverable by the post office.

## **Age Discrepant Registration – over 105 or under 17 - Section 1**

*An incorrect age is a false registration which disqualifies registrant as a voter. Georgia Code clearly depicts the age restraints and qualifications for voters (216.c) that are to be utilized when registering to vote.*

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 6 - Registration of Voters**

#### **§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 15 - Miscellaneous Offenses**

#### **§ 21-2-571. Voting by Unqualified Elector or Giving False Information**

**Universal Citation:** [GA Code § 21-2-571 \(2022\)](#)

USA-GA1-03-01-DOB-Age Discrepant - Registered before legally allowed to vote

BJH Records Returned 849

Registrations with discrepant Registration Date, Registration Date and age do not match - Result in under age registration or Registered in the future.

Query:

The Subquery first checks for registration dates in the future (Voter Roll is dated 11-23-2022). It sets the number as -999 for these instances. Also checks for null registration dates. It sets the number as -999 for these instances.

Then it subtracts the year of the registration date from 2022 to see how old the registration is. It passes that number to the main query.

The main query selects every entry iin the voter roll that had a registration date before they turned 16, according to their birthyear in the voter roll. Or the entries that were set to -999 in the subquery.

The results of this query are those entries that registered before they were 16 years old or registered in the future or have no registration date recorded on the voter roll.

## Backdated Registration - Section 1

*Willfully entering false information on a voter application or in the voter roll is a felony (S.562.a) by the county (S.226.a).*

### 2022 Georgia Code

#### Title 21 - Elections

#### Chapter 2 - Elections and Primaries Generally

#### Article 15 - Miscellaneous Offenses

#### § 21-2-562. Fraudulent Entries; Unlawful Alteration or Destruction of Entries; Unlawful Removal of Documents; Neglect or Refusal to Deliver Documents

Universal Citation: [GA Code § 21-2-562 \(2022\)](#)

### 2022 Georgia Code

#### Title 21 - Elections

#### Chapter 2 - Elections and Primaries Generally

#### Article 6 - Registration of Voters

#### § 21-2-226. Duties of County Board in Determining Eligibility of Voters; Maps of Municipal Boundaries; Notice of Ineligibility; Issuance of Registration Cards; Reimbursement for Postage Cost

Universal Citation: [GA Code § 21-2-226 \(2022\)](#)

USA-GA1-04-01-RDT-Backdated\_Registrations - Not on 2021 Voter Roll but on 2022 with Registration Date prior to 2021  
BJH Returned Records 28335

Backdated Registrations

Registration exists now but did not in previous snapshot,  
but registration date is prior to previous snapshot.

This query joins the 20210127 voter roll with the vr20221123 voter roll AND  
selects all entries that did not exist in 2021 but are on the 2022 voter roll.  
They also have a registration date before 2021 voter roll on the 2022 voter roll.

## Invalid Registration Date (99999999/5201011) - Section 1

*Eight 9's and "5201011" are clearly false data which disqualifies the voter (S.216.a.1). OCGA states it is a felony (S.562.a) by the county (S.226.a).*

### 2022 Georgia Code

#### Title 21 - Elections

#### Chapter 2 - Elections and Primaries Generally

#### Article 6 - Registration of Voters

#### § 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of

## **Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 15 - Miscellaneous Offenses**

#### **§ 21-2-562. Fraudulent Entries; Unlawful Alteration or Destruction of Entries; Unlawful Removal of Documents; Neglect or Refusal to Deliver Documents**

**Universal Citation:** [GA Code § 21-2-562 \(2022\)](#)

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 6 - Registration of Voters**

#### **§ 21-2-226. Duties of County Board in Determining Eligibility of Voters; Maps of Municipal Boundaries; Notice of Ineligibility; Issuance of Registration Cards; Reimbursement for Postage Cost**

**Universal Citation:** [GA Code § 21-2-226 \(2022\)](#)

USA-GA1-05-01-SUS-Invalid Registration Date Values - 99999999 and 5201011

RECORDS RETURNED: 47

BJH

This query will return the two values that we found as registration dates that are not saved as valid dates in the voter roll. In the table, the registration date column is saved as an integer representing the date (ex 20221108 = Nov 8, 2022)

These two values (99999999 and 5201011) cannot be converted to dates, so they are invalid data entered into the voter roll.

## **Invalid Names - Section 1**

*Federal and state code require valid legal names, which are defined with full name definitions to voter identification. First or last name missing, or last name of only one character.*

*Voter Identification (S.417.I.c.1) - Full Legal Name, this links to USC 6 - Homeland Security chapter 1 - Part 37 - Real ID Driver's Licenses and ID Cards. Required documentation for voter registration (S.221).*

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 11 - Preparation for and Conduct of Primaries and Elections**

#### **Part 1 - General Provisions**



## **§ 21-2-417.1. Voter Identification Card**

**Universal Citation:** [GA Code § 21-2-417.1 \(2022\)](#)

### **2022 Georgia Code**

#### **Title 21 – Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 6 - Registration of Voters**

### **§ 21-2-220.1. Required Documentation for Voter Registration**

**Universal Citation:** [GA Code § 21-2-220.1 \(2022\)](#)

USA-GA1-06-01-SUS-Invalid Names-Names with invalid or < 1 characters

BJH Records Returned: 205

Registrations that have a first, last or middle name that contain invalid or control characters or have no First or Last Names or Last names of 1 character

The subquery returns the values for first, middle and last name for all entries in the 2022-11-08 voter roll.

The main query then does a search in each name field, excluding all valid characters. Any name that has any character, including non visible control characters, will be returned by this query. It will also return records that have no First or Last name or a last name consisting of just 1 character.

## **Sunday Registration - Section 1**

*Registrations on Sundays prior to 2017 are or include false data and disqualify the registrant (S.216.a.1).*

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 6 - Registration of Voters**

### **§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

USA-GA1-07-01-RDT-Sunday Registration - Registration Date is a Sunday

BJH RETURNS 201,195 records

Registration Date in Voter Roll falls on a Sunday

This query returns all registrations that have a registration date that falls on a Sunday.

It is possible that instead of entering the registration

date as when the registration was added into the system, it was entered as the date when the Voter submitted the registration.

The first subquery converts the registration date into a date field, and extracts the day of the week from that date. (0=Sunday). It removes invalid registration date entries to avoid conversion errors and returns all Registration Days of the week from the voter roll.

The main query displays those entries. It returned 102156 records

## January 1 Registration - Section 1

*Registrations on January 1 prior to 2017 are or include false data and disqualify the registrant (S.216.a.1).*

### 2022 Georgia Code

#### Title 21 - Elections

#### Chapter 2 - Elections and Primaries Generally

#### Article 6 - Registration of Voters

#### § 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases

#### Universal Citation: [GA Code § 21-2-216 \(2022\)](#)

USA-GA1-08-01-RDT-Registration Date-Registered on Jan 1  
BJH Records Returned 82763  
Registration date is recorded as Jan 1st

The Subquery selects the registration numbers and the MONTH and DAY of the recorded REGISTRATION\_DATE of the entry. The DATE\_PART function converts the date value into its parts and returns 'DAY' or MONTH' or 'YEAR' as instructed as a number. DAY 1 = 'SUNDAY'  
MONTH 1 = 'JANUARY'

The main query selects the records from the first query whose month and day are both 1 indicating it was on January 1. Though we believe the registration date should be the date the record was entered into the voter roll, it may be the date that the registration was submitted by the potential voter online.

## Expired Registration dates (8+ years of no contact) - Section 1

*Query Used last contact before 1/1/14, which voters would have been inactivated in 2017, when the grace period in (S.234.a.), (S.234.c.2), and (S.234.g) was 3 yr, rather than the current 5. Then the inactive voter should have been removed from rolls right after the 2020 election (S.235.b).*

### 2017 Georgia Code

#### Title 21 - Elections

#### Chapter 2 - Elections and Primaries Generally

#### Article 6 - Registration of Voters

#### § 21-2-234. Electors Who Have Failed to Vote and With Whom There Has Been No Contact in Three Years; Confirmation Notice Requirements and Procedure; Time for

## Completion of List Maintenance Activities

**Universal Citation:** [GA Code § 21-2-234 \(2017\)](#)

### 2020 Georgia Code

#### Title 21 - Elections

#### Chapter 2 - Elections and Primaries Generally

#### Article 6 - Registration of Voters

#### § 21-2-235. Inactive List of Electors

**Universal Citation:** [GA Code § 21-2-235 \(2020\)](#)

USA-GA1-09-01-SUS-Expired Registrations-Registrations with No Contact for 8+ Years

BJH Records Returned: 92,024

ALL ENTRIES WITH LCD < 2014 :107,260

-----  
FURTHER ANALYSIS:

Entries in Active Status on 2021-01-27 :92,024

Entries in Inactive Status on 2021-01-27 :15,236

Entries in Active Status on 2022-11-23 :37

Entries in Inactive Status on 2022-11-23 :107,223

Entries moved to Inactive Status

between 2021-01-27 and 2022-11-23 :91,988

Entries moved from Inactive to Active

between 2021-01-27 and 2022-11-23 :1

Entries in Inactive Status in both :15,235

Entries in Active Status in both :36

Entries with modified LAST\_CONTACT DATE

between 2021-01-27 and 2022-11-23 :36  
-----

Registrations with no contact in 8+ years

GA Code 21-2-234 specifies electors with no contact for 3 years shall be moved to inactive status (in 2017).

GA Code 21-2-235 specifies that electors on Inactive list that have no contact for two November Election while on the Inactive List shall be processed for removal from the Voter Roll.

This query returns all entries in the 2022-11-23 and 2021-01-27 voter rolls that have a LAST\_CONTACT\_DATE before Jan 1, 2014. All returned rows have a last contact date of Dec 31, 2013 or earlier.

Adding 3 Calendar years to any of these dates come up to a most recent date of Dec 31, 2016. According to GA Code 21-2-234 (as of the year 2017), all of these entries that did not respond to a Confirmation Mailing should have been moved to INACTIVE status in the year 2017.

Subsequently, according to GA Code 21-2-235, if these entries had been in INACTIVE status in 2017, they should have been processed for removal in the year 2021. They all still appear on the voter roll in 2022.

This query was limited to the 2022-11-23 and 2021-01-27 voter rolls. I have limited this query to only those entries that were in "ACTIVE" status on the 2021-01-27 Voter roll, when according to the laws referred to above, the majority of these entries should have been set to "INACTIVE" status in 2017.

These registrations would have missed 2018 and 2020 general elections per 21-2-235 should have been processed for removal in 2021

## Section 2

## Illegal Duplicate Registrations - Section 2

*Federal and State law only provide suffrage for one vote per voter (S.572).*

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 15 - Miscellaneous Offenses**

#### **§ 21-2-572. Repeat Voting in Same Primary or Election**

**Universal Citation:** [GA Code § 21-2-572 \(2022\)](#)

USA-GA2-01-01-DUP-dupes on first, middle, last + YOB - diff reg# +Voted  
by SB

Count: 36237

Duplicate Registrations - Same Person, first, middle, last name & YOB - new REGISTRATION\_NUMBER + VOTED

This query creates two temporary tables from the same voter roll (11/23/2022), adding a name hash of first, middle last name and YOB.

The name hash is used to identify the same voter with a different registration number. Registrations using a middle initial are excluded (listed in a separate query)

## Invalid Addresses Found - Section 2

*This represents false information, and the registration violates (S.216.a.1), The residence of any person shall be that place in which such person's habitation is fixed (S217.a.1) rendering the registrant unqualified to vote. If the falsehood was intentional, it is also a violation of (S.562.a). Felony if intentional, (S.571).*

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 6 - Registration of Voters**

#### **§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 15 - Miscellaneous Offenses**

#### **§ 21-2-571. Voting by Unqualified Elector or Giving False Information**

**Universal Citation:** [GA Code § 21-2-571 \(2022\)](#)

**2022 Georgia Code**

**Title 21 - Elections**

**Chapter 2 - Elections and Primaries Generally**

**Article 6 - Registration of Voters**

**§ 21-2-217. Rules for Determining Residence**

**Universal Citation:** [GA Code § 21-2-217 \(2022\)](#)

**2022 Georgia Code**

**Title 21 - Elections**

**Chapter 2 - Elections and Primaries Generally**

**Article 15 - Miscellaneous Offenses**

**§ 21-2-562. Fraudulent Entries; Unlawful Alteration or Destruction of Entries; Unlawful Removal of Documents; Neglect or Refusal to Deliver Documents**

**Universal Citation:** [GA Code § 21-2-562 \(2022\)](#)

USA-GA2-02-01-ADR-Questionable Addresses - Invalid or Redacted\_Address\_Registrations - Voted on 11-08-2022  
BJH Records Returned: 308

This query returns entries that have no residence house NUMBER  
or no residence street name or with the residence street name of 'MISSING ADDRESS'  
or no city  
or no zip code  
or a place holder zip code of '99999'  
or invalid or control characters in any of the address fields

USA-GA2-02-02-ADR-ILLEGAL Registrations-PO Box as Residence address - Voted in 2022

BJH Records Returned: 453

It is illegal to register in Georgia using a PO Box  
Residence address must be where you live.  
These registrations are using a Post Office or Mail Box Business as their residential addresses

This query select all the entries in the 11-23-2022 voter roll that are registered using an address stored in the GA\_USPS table.

GA\_USPS table compiled by screenscrapes from  
<https://postofficepage.com/unitedstates/georgia>  
<https://locations.theupsstore.com/ga>

WEB LINK column links to Google Maps view of the residence address of the registration

USA-GA2-02-03-ADR-Invalid Address - Multi Unit addresses with No Unit Number - Voted in 2022

BJH Records Returned 10,508

Registrants that live at a multi unit address but have no unit number in registration.

Query Described:

SUBQUERY ADDRESSES compiles a list of distinct addresses in the 11-23-2022 voter roll.

This is based on a string that combines the house number-street name-city and zip code of the registrar's residence address on the voter roll (with spaces removed)

SUBQUERY HOW\_MANY returns a count of how many registrants are registered at those distinct addresses compiled in the ADDRESSES subquery AND have at least 1 registration with a unit number.

SUBQUERY MU\_ADDRESSES uses an arbitrary number of at least 10 registrations from the HOW\_MANY subquery to establish that address as a multi unit address. The addresses returned by the MU\_ADDRESSES subquery will be all the addresses in the voter roll that have at least 10 registrations that use that address as their residential address and have at least one of them declaring that they live in a separate and distinct UNIT at that address.

SUBQUERY INVALID\_REGISTRANTS returns the individual registration records for those registrations that live at one of the addresses returned from the MU\_ADDRESSES subquery that do NOT have a residence\_apartment\_unit\_number as part of their residential address.

SUBQUERY VOTED returns all the registrations that are credited with voting in the 2022 elections from the 2022 Voter History table.

THE MAIN QUERY then returns all the registrations with no unit number at the addresses returned by the INVALID\_REGISTRANTS subquery that were credited with a vote in the VOTED subquery.

## **Age Discrepant Registration – over 105 or under 17 - Section 2**

*If an elector voted before he turned 18, he was not qualified to vote (S.216.1.3), and therefore committed a felony (S.571).*

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 6 - Registration of Voters**

#### **§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 15 - Miscellaneous Offenses**

#### **§ 21-2-571. Voting by Unqualified Elector or Giving False Information**

**Universal Citation:** [GA Code § 21-2-571 \(2022\)](#)

USA-GA2-03-01-DOB-Age Discrepant - Registered before legally allowed to vote - Voted in 2022  
BJH Records Returned 540  
Registrations with discrepant Registration Date



Registration Date and age do not match - Result in under age registration or Registered in the future.

Query:

The first subquery select the distinct registration numbers that cast a vote in 2022

The second subquery is limited to the registration numbers returned in the first subquery by a JOIN and first checks for registration dates in the future (Voter Roll is dated 11-23-2022). It sets the number as -999 for these instances. Also checks for null registration dates. It sets the number as -999 for these instances. Then it subtracts the year of the registration date from 2022 to see how old the registration is. It passes that number to the main query.

The main query selects every entry in the voter roll that had a registration date before they turned 16, according to their birthyear in the voter roll. Or the entries that were set to -999 in the subquery.

The results of this query are those entries that cast a vote in 2022 and that registered before they were 16 years old or registered in the future or have no registration date recorded on the voter roll.

## **Backdated Registration - Section 2**

*A back-dated registration date is false data for this registrant. That would disqualify him by (S.216.a.1), if intentional, a felony, (S.571), (S.562).*

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 6 - Registration of Voters**

#### **§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 15 - Miscellaneous Offenses**

#### **§ 21-2-571. Voting by Unqualified Elector or Giving False Information**

**Universal Citation:** [GA Code § 21-2-571 \(2022\)](#)

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 15 - Miscellaneous Offenses**

#### **§ 21-2-562. Fraudulent Entries; Unlawful Alteration or Destruction of Entries; Unlawful Removal of Documents; Neglect or Refusal to Deliver Documents**

**Universal Citation:** [GA Code § 21-2-562 \(2022\)](#)

USA-GA2-04-01-RDT-Backdated\_Registrations - Not on 2021 Voter Roll but on 2022 with Registration Date prior to 2021-Voted 2022

BJH Returned Records 7305

Backdated Registrations

Registration exists now but did not in previous snapshot, but registration date is prior to previous snapshot.

This query joins the 20210127 voter roll with the vr20221123 voter roll AND selects all entries that did not exist in 2021 but are on the 2022 voter roll. They also have a registration date before 2021 voter roll on the 2022 voter roll.

## **Invalid Registration Date (99999999/5201011) - Section 2**

*False data would disqualify the registrant (S.216.a.1), if intentional, felony, (S.571).*

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 6 - Registration of Voters**

**§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 15 - Miscellaneous Offenses**

**§ 21-2-571. Voting by Unqualified Elector or Giving False Information**

**Universal Citation:** [GA Code § 21-2-571 \(2022\)](#)

USA-GA2-05-01-SUS-Invalid Registration Date Values - 99999999 and 5201011 - Voted on 11-08-2022

RECORDS RETURNED: 20

BJH

This query will return the two values that we found as registration dates that are not saved as valid dates in the voter roll. In the table, the registration date column is saved as an integer representing the date (ex 20221108 = Nov 8, 2022)

The subquery selects the unique registration numbers who are recorded as voting in the 11-08-2022 election.

The Main query selects those entries in the voter roll that have one of two invalid Values recorded as registration dates, and returns those that are on the subquery as voted on 11-08-2022.

These two values (99999999 and 5201011) cannot be converted to dates, so they are invalid data entered into the voter roll.

## **Invalid Names - Section 2**

*This is false data, and voting with a false name is intentional in GA, because one has to sign as registered when one votes (S.216.a.1) and, if intentional, (S.571).*

## **2022 Georgia Code**

### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

##### **Article 6 - Registration of Voters**

###### **§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

## **2022 Georgia Code**

### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

##### **Article 15 - Miscellaneous Offenses**

###### **§ 21-2-571. Voting by Unqualified Elector or Giving False Information**

**Universal Citation:** [GA Code § 21-2-571 \(2022\)](#)

USA-GA2-06-01-SUS-Invalid Names-Names with invalid or < 1 characters - Voted in 2022

BJH Records Returned: 58

Registrations that have a first, last or middle name that contain invalid or control characters or have no First or Last Names or Last names of 1 character

The first subquery (CTE) returns the registration numbers of those voters who cast a vote in 2022.

The second subquery returns the values for first, middle and last name for all entries in the 2022-11-08 voter roll, using the first subquery to limit only to those who voted in 2022.

The main query uses the second subquery and then does a search in each name field, excluding all valid characters. Any name that has any character, including non visible control characters, will be returned by this query. It will also return records that have no First or Last name or a last name consisting of just 1 character.

This query returns all entries that have invalid names that voted in 2022.

## **Sunday Registration - Section 2**

*Since the unlawful registration disqualified the voter it also disqualifies the vote (S.216.a.1) and, if intentional, a felony (S.571).*

## **2022 Georgia Code**

### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

##### **Article 6 - Registration of Voters**

###### **§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From**

**List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

**2022 Georgia Code**

**Title 21 - Elections**

**Chapter 2 - Elections and Primaries Generally**

**Article 15 - Miscellaneous Offenses**

**§ 21-2-571. Voting by Unqualified Elector or Giving False Information**

**Universal Citation:** [GA Code § 21-2-571 \(2022\)](#)

USA-GA2-07-01-RDT-Sunday Registration - Registration Date is a Sunday - Voted on 11-08-2022

BJH RETURNS 110729 records

Registration Date in Voter Roll falls on a Sunday

This query returns all registrations that have a registration date that falls on a Sunday.

It limits the returns to only those registration dates before 2017, which is when we believe online registration was made available. It is possible that instead of entering the registration date as when the registration was added into the system, it was entered as the date when the Voter submitted the registration.

The first subquery returns all registrations that cast a vote in the 2022-11-08 election.

The second subquery uses the results from the first subquery (CTE) and converts the registration date into a date field, and extracts the day of the week from that date. (0=Sunday).

It removes invalid registration date entries to avoid conversion errors and returns all Registration Days of the week from the voter roll.

The third subquery then only selects the Sunday registration dates prior to 2017.

The main query displays those entries. It returned 67,113 records

## **January 1 Registration - Section 2**

*Since the unlawful registration disqualified the voter it also disqualifies the vote (S.216.a.1) and, if intentional, a felony (S.571)*

**2022 Georgia Code**

**Title 21 - Elections**

**Chapter 2 - Elections and Primaries Generally**

**Article 6 - Registration of Voters**

**§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

## **2022 Georgia Code**

### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 15 - Miscellaneous Offenses**

#### **§ 21-2-571. Voting by Unqualified Elector or Giving False Information**

#### **Universal Citation: [GA Code § 21-2-571 \(2022\)](#)**

USA-GA2-08-01-RDT-Registration Date-Registered on Jan 1 - Voted in 2022

BJH Records Returned 71,057

Registration date is recorded as Jan 1st

The Subquery selects the registration numbers and the MONTH and DAY of the recorded REGISTRATION\_DATE of the entry. The DATE\_PART function converts the date value into its parts and returns 'DAY' or MONTH' or 'YEAR' as instructed as a number. DAY 1 = 'SUNDAY' MONTH 1 = 'JANUARY'

The first subquery gets the registration numbers of all electors who voted in the 2022 elections. The second subquery takes that list and selects the registration numbers and the MONTH and DAY of the recorded REGISTRATION\_DATE of the entry. The DATE\_PART function converts the date value into its parts and returns 'DAY' or MONTH' or 'YEAR' as instructed as a number. DAY 1 = 'SUNDAY' MONTH 1 = 'JANUARY'

The main query selects the records from the first query whose month and day are both 1 indicating it was on January 1. Though we believe the registration date should be the date the record was entered into the voter roll, it may be the date that the registration was submitted by the potential voter online.

So this query returns all electors who voted in 2022 that had a registration date recorded on Jan 1 of years before 2017.

## **Expired Registration dates (8+ years of no contact) - Section 2**

*Query Used last contact before 1/1/14, which voters would have been inactivated in 2017, when the grace period in (S.234.a.), (S.234.c.2), and (S.234.g) was 3 yr, rather than the current 5. Then the inactive voter should have been removed from rolls right after the 2020 election (S.235.b). Being inactive through 2 election cycles is one kind of legal disqualification from being an elector (S.216.a.5). Therefore, he is no longer an elector (S.216.f) even if he is still wrongly registered.*

## **2017 Georgia Code**

### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 6 - Registration of Voters**

#### **§ 21-2-234. Electors Who Have Failed to Vote and With Whom There Has Been No Contact in Three Years; Confirmation Notice Requirements and Procedure; Time for Completion of List Maintenance Activities**

#### **Universal Citation: [GA Code § 21-2-234 \(2017\)](#)**

## **2020 Georgia Code**

**Title 21 - Elections**

**Chapter 2 - Elections and Primaries Generally**

**Article 6 - Registration of Voters**

**§ 21-2-235. Inactive List of Electors**

**Universal Citation:** [GA Code § 21-2-235 \(2020\)](#)

**2022 Georgia Code**

**Title 21 - Elections**

**Chapter 2 - Elections and Primaries Generally**

**Article 6 - Registration of Voters**

**§ 21-2-216. Qualifications of Electors Generally; Reregistration of Electors Purged From List; Eligibility of Nonresidents Who Vote in Presidential Elections; Retention of Qualification for Standing as Elector; Evidence of Citizenship; Check of Convicted Felons and Deceased Persons Databases**

**Universal Citation:** [GA Code § 21-2-216 \(2022\)](#)

USA-GA2-09-01-SUS-Expired Registrations-Registrations with No Contact for 8+ Years Voted in 2022

BJH Records Returned: 181

ALL ENTRIES WITH LCD < 2014 :107,260

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**FURTHER ANALYSIS:**

Entries in Active Status on 2021-01-27 :92,024

Entries in Inactive Status on 2021-01-27 :15,236

Entries in Active Status on 2022-11-23 :37

Entries in Inactive Status on 2022-11-23 :107,223

Entries moved to Inactive Status

between 2021-01-27 and 2022-11-23 :91,988

Entries moved from Inactive to Active

between 2021-01-27 and 2022-11-23 :1

Entries in Inactive Status in both :15,235

Entries in Active Status in both :36

Entries with modified LAST\_CONTACT\_DATE

between 2021-01-27 and 2022-11-23 :36  
-----

Registrations with no contact in 8+ yearsGA Code 21-2-234 specifies electors with no contact for 3 years shall be moved to inactive status (in 2017). GA Code 21-2-235 specifies that electors on Inactive list that have no contact for two November Election while on the Inactive List shall be processed for removal from the Voter Roll.

This query returns all entries in the 2022-11-23 and 2021-01-27 voter rolls that have a LAST\_CONTACT\_DATE before Jan 1, 2014. All returned rows have a last contact date of Dec 31,2013 or earlier. Adding 3 Calendar years to any of these dates come up to a most recent date of Dec 31, 2016. According to GA Code 21-2-234 (as of the year 2017), all of these entries that did not respond to a Confirmation Mailing should have been moved to INACTIVE status in the year 2017.

Subsequently, according to GA Code 21-2-235, if these entries had been in INACTIVE status in 2017, they should have been processed for removal in the year 2021. They all still appear on the voter roll in 2022.

This query starts by finding all registrations that cast a vote in 2022. It then finds the registrations in that list that had a LAST\_CONTACT\_DATE in 2021 before Jan 1 2014. The third subquery then takes the results of the first two queries and find those that had a LAST\_CONTACT\_DATE before Jan 1 2014 in 2022 and that were in ACTIVE status in 2021.



These registrations would have missed 2018 and 2020 general elections per 21-2-235 should have been processed for removal in 2021, yet they voted in 2022.

## **Registration After Cutoff Date (10/10/2022) and Voted - Section 2**

*There is a legal deadline (S.224) for applying for registration, not for it being approved. The deadline is ~29 days, or 25 days for a mailed application without postmark.*

### **2022 Georgia Code**

#### **Title 21 - Elections**

#### **Chapter 2 - Elections and Primaries Generally**

#### **Article 6 - Registration of Voters**

#### **§ 21-2-224. Registration Deadlines; Restrictions on Voting in Primaries; Official List of Electors; Voting Procedure When Portion of County Changed From One County to Another**

**Universal Citation:** [GA Code § 21-2-224 \(2022\)](#)

USA-GA2-10-01-RDT-Registration Date after Cutoff Date - Voted on 20221108

RECORDS RETURNED: 14399

BJH

Registration date is recorded as being after the last date to legally registered for the 11-08-2022 election Oct 10 2022.

This query first selects the distinct registration\_numbers of voters who cast a vote in the Nov 8,2022 election.

It then uses that list of registration numbbber and selects any entry whose recorded REGISTRATION\_DATE is equal to or after the date 20221010 (Oct 20 2022) It is limited to checking just the registration date. It doesn't compare it with any other data.

In the table, the registration\_date column is saved as a number. It Needed to be converted to a date for the ability to compare with a date. Also had to remove records with an invalid registration\_date of '99999999', which causes an error.

CONCLUSION - These electors had a registrations date that did not legally allow them to vote on 11-08-2022.

# Exhibit H



# Georgia's 2022 General Election Validity Reconciliation

GROUP	DESCRIPTION	REGISTRATIONS	2022 GENERAL ELECTION VOTES
Eligible	Records appear valid so voters are presumed <b>eligible</b> to vote. Results can be certified.	<b>6,416,495</b>	<b>3,717,945</b>
Uncertain	Records contain illogical and/or invalid information, so it is <b>uncertain</b> whether voters are eligible to vote. Investigation is required before results can be certified.	<b>279,874</b>	<b>178,141</b>
Ineligible	Records appear to violate black letter election laws, so voters are presumed <b>ineligible</b> to vote. Investigation is required before results can be certified.	<b>257,116</b>	<b>63,144</b>
Deadwood*		<b>0</b>	<b>0</b>

**TOTAL****6,953,485****3,959,230**

Total Database Records / Total Votes Counted per official published tallies

6,953,4853,924,926**DIFFERENCE (fewer voted counted than voters who voted):****0****34,304 \*\***

Registration Error Rate .....7.7%  
Vote Error Rate..... 6.1%  
Margin of Victory in US Senate (Walker/Warnock/Oliver)..... 1.0%  
Legal Standard of Allowable Error for Federal Elections\*\*\* .....0.0008%



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# Georgia's 2022 General Election Validity Reconciliation

**The measured error rate of the electoral process in Georgia, from registration through certification, makes it impossible to legally certify any election in Georgia.** Whether due to ignorance, arrogance or malice, the error rate simply outstrips the margins of victory. Countless unique investigations were required by law before certification could proceed. Election officials may never be able to prove that those granted the privilege of writing laws for the nation legitimately represented the will of eligible citizen voters.

The registration and voting error rates reported here represent minimums. We have ample reason for concern, after two years of careful study, that the actual error rates are higher.

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## 2022 Federal Elections in which the error rate exceeded the margin of victory:

**US Senate (Walker/Warnock/Oliver), Statewide races: Lieutenant Governor; Attorney General; State Senate, District 7; and State House Districts 53, 105, 108, 117.**

**Every race in Georgia's 2022 GE was irretrievably impacted by an error rate 7,600 times the legal standard for system accuracy.**

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*\* "'Deadwood' allows for fraudulent ballots, which can be used to stuff the ballot box." Federal Prosecution of Election Offenses, Eighth Edition, 2017, US Department of Justice Public Integrity Section, Chapter 2 Corruption of the Election Process (B)(5)(a), Richard C. Pilger, ed., p. 28.*

*\*\* 34,304 records of participating voters is greater than the certified number of votes counted.*

*\*\*\* "This rate is set at a sufficiently stringent level such that the likelihood of voting system errors affecting the outcome of an election is exceptionally remote even in the closest of elections." Voting System Standards, Volume I: Performance Standards. April, 2002, Federal Election Commission, United States of America. The accuracy requirement of the voting system is predicated on the voter rolls being accurate as required by the National Voter Registration Act, 1993.*

*Source: Voter rolls of 11/23/2022 as purchased from the Georgia SOS. Voter history file for 2022 as downloaded from the Georgia SOS website.*

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# Exhibit I

## County JAN 1 Registration Ana

county	Number Registered on Jan 1	Percent of Total Registered on Jan 1
APPLING	2279	2.75
ATKINSON	987	1.19
BACON	12	0.01
BAKER	519	0.63
BALDWIN	660	0.8
BANKS	29	0.04
BARROW	11	0.01
BARTOW	119	0.14
BEN HILL	1506	1.82
BERRIEN	58	0.07
BIBB	23	0.03
BLECKLEY	3	0
BRANTLEY	284	0.34
BROOKS	1390	1.68
BRYAN	11	0.01
BULLOCH	141	0.17
BURKE	61	0.07
BUTTS	6	0.01
CAMDEN	8	0.01
CANDLER	26	0.03
CARROLL	44	0.05
CATOOSA	76	0.09
CHARLTON	1225	1.48
CHATHAM	21281	25.71
CHATTAHOOCHEE	281	0.34
CHATTOOGA	11	0.01
CHEROKEE	47	0.06
CLARKE	37	0.04
CLAY	5	0.01
CLAYTON	41	0.05
CLINCH	889	1.07
COBB	2636	3.18
COLQUITT	8	0.01
COLUMBIA	27	0.03
COOK	1366	1.65
COWETA	268	0.32
CRAWFORD	1060	1.28
CRISP	15	0.02
DADE	70	0.08
DAWSON	32	0.04
DECATUR	4	0
DEKALB	6441	7.78
DODGE	41	0.05
DOUGHERTY	20	0.02
DOUGLAS	29	0.04
ECHOLS	171	0.21
EFFINGHAM	14	0.02
ELBERT	2555	3.09
EMANUEL	3	0
EVANS	4	0



## County JAN 1 Registration Ana

FANNIN	32	0.04
FAYETTE	105	0.13
FLOYD	6403	7.74
FORSYTH	63	0.08
FRANKLIN	169	0.2
FULTON	505	0.61
GILMER	22	0.03
GLASCOCK	316	0.38
GLYNN	140	0.17
GORDON	5082	6.14
GRADY	3	0
GREENE	997	1.2
GWINNETT	139	0.17
HABERSHAM	47	0.06
HALL	88	0.11
HANCOCK	32	0.04
HARALSON	15	0.02
HARRIS	548	0.66
HART	4	0
HEARD	52	0.06
HENRY	38	0.05
HOUSTON	42	0.05
IRWIN	195	0.24
JACKSON	59	0.07
JASPER	12	0.01
JEFF DAVIS	7	0.01
JEFFERSON	170	0.21
JENKINS	56	0.07
JOHNSON	9	0.01
JONES	52	0.06
LAMAR	545	0.66
LAURENS	11	0.01
LEE	12	0.01
LIBERTY	16	0.02
LINCOLN	7	0.01
LONG	4	0
LOWNDES	109	0.13
LUMPKIN	6	0.01
MACON	159	0.19
MADISON	10	0.01
MARION	40	0.05
MCINTOSH	1401	1.69
MERIWETHER	6	0.01
MILLER	73	0.09
MONROE	3	0
MONTGOMERY	921	1.11
MORGAN	10	0.01
MURRAY	3	0
MUSCOGEE	43	0.05
NEWTON	36	0.04
OCONEE	3138	3.79

## County JAN 1 Registration Ana

OGLETHORPE	114	0.14
PAULDING	39	0.05
PEACH	27	0.03
PICKENS	32	0.04
PIERCE	8	0.01
PIKE	19	0.02
POLK	42	0.05
PULASKI	118	0.14
PUTNAM	2	0
QUITMAN	240	0.29
RABUN	9	0.01
RANDOLPH	292	0.35
RICHMOND	203	0.25
ROCKDALE	19	0.02
SCHLEY	347	0.42
SCREVEN	59	0.07
SEMINOLE	26	0.03
SPALDING	16	0.02
STEPHENS	5	0.01
STEWART	782	0.94
SUMTER	1692	2.04
TALBOT	140	0.17
TALIAFERRO	14	0.02
TATTNALL	63	0.08
TAYLOR	6	0.01
TELFAIR	6	0.01
TERRELL	3	0
THOMAS	21	0.03
TIFT	10	0.01
TOOMBS	19	0.02
TOWNS	64	0.08
TREUTLEN	754	0.91
TROUP	13	0.02
TURNER	1094	1.32
TWIGGS	2	0
UNION	185	0.22
UPSON	36	0.04
WALKER	6031	7.29
WALTON	68	0.08
WARE	22	0.03
WARREN	28	0.03
WASHINGTON	5	0.01
WAYNE	126	0.15
WEBSTER	308	0.37
WHEELER	310	0.37
WHITE	407	0.49
WHITFIELD	96	0.12
WILCOX	6	0.01
WILKES	29	0.04
WILKINSON	5	0.01
WORTH	5	0.01

## County JAN 1 Registration Ana

Registered on All Other Days	Total Registered in County	PCT of County Registrations on Jan 1
10024	12303	18.52
3851	4838	20.4
7022	7034	0.17
1725	2244	23.13
26890	27550	2.4
14146	14175	0.2
62356	62367	0.02
82374	82493	0.14
9452	10958	13.74
12516	12574	0.46
116260	116283	0.02
8133	8136	0.04
11950	12234	2.32
10210	11600	11.98
35623	35634	0.03
50019	50160	0.28
17263	17324	0.35
18909	18915	0.03
42189	42197	0.02
6980	7006	0.37
90314	90358	0.05
50932	51008	0.15
6046	7271	16.85
210178	231459	9.19
4406	4687	6
15519	15530	0.07
208126	208173	0.02
82735	82772	0.04
2206	2211	0.23
207764	207805	0.02
3529	4418	20.12
566682	569318	0.46
27020	27028	0.03
122016	122043	0.02
10232	11598	11.78
114429	114697	0.23
8010	9070	11.69
13495	13510	0.11
13449	13519	0.52
24435	24467	0.13
18114	18118	0.02
568346	574787	1.12
12137	12178	0.34
70163	70183	0.03
109199	109228	0.03
2103	2274	7.52
50481	50495	0.03
11024	13579	18.82
14915	14918	0.02
6677	6681	0.06

## County JAN 1 Registration Ana

21956	21988	0.15
97680	97785	0.11
58534	64937	9.86
177106	177169	0.04
16618	16787	1.01
862303	862808	0.06
24467	24489	0.09
1809	2125	14.87
66691	66831	0.21
34091	39173	12.97
16096	16099	0.02
15005	16002	6.23
636413	636552	0.02
31207	31254	0.15
144213	144301	0.06
6152	6184	0.52
22888	22903	0.07
28051	28599	1.92
18828	18832	0.02
8519	8571	0.61
188398	188436	0.02
119646	119688	0.04
6095	6290	3.1
59174	59233	0.1
11593	11605	0.1
9077	9084	0.08
11526	11696	1.45
5376	5432	1.03
5756	5765	0.16
21400	21452	0.24
13707	14252	3.82
34915	34926	0.03
25048	25060	0.05
44606	44622	0.04
6607	6614	0.11
11688	11692	0.03
84113	84222	0.13
24393	24399	0.02
7257	7416	2.14
22673	22683	0.04
5245	5285	0.76
8844	10245	13.67
16702	16708	0.04
4067	4140	1.76
22669	22672	0.01
4824	5745	16.03
16300	16310	0.06
24796	24799	0.01
142278	142321	0.03
88375	88411	0.04
29802	32940	9.53

## County JAN 1 Registration Ana

11273	11387	1
128865	128904	0.03
19794	19821	0.14
26321	26353	0.12
13513	13521	0.06
15127	15146	0.13
26957	26999	0.16
5923	6041	1.95
17250	17252	0.01
1538	1778	13.5
14018	14027	0.06
4304	4596	6.35
152850	153053	0.13
69145	69164	0.03
2738	3085	11.25
10272	10331	0.57
6314	6340	0.41
51206	51222	0.03
19838	19843	0.03
2302	3084	25.36
17096	18788	9.01
4650	4790	2.92
1290	1304	1.07
12825	12888	0.49
5590	5596	0.11
6537	6543	0.09
6981	6984	0.04
32819	32840	0.06
26900	26910	0.04
17544	17563	0.11
11713	11777	0.54
3716	4470	16.87
48447	48460	0.03
4894	5988	18.27
6417	6419	0.03
21857	22042	0.84
19370	19406	0.19
42087	48118	12.53
77391	77459	0.09
22370	22392	0.1
3987	4015	0.7
13555	13560	0.04
19769	19895	0.63
1475	1783	17.27
3020	3330	9.31
22206	22613	1.8
58821	58917	0.16
4776	4782	0.13
7133	7162	0.4
6878	6883	0.07
14529	14534	0.03

## County JAN 1 Registration Ana

Expected registrations on Any Day (260 Business Days)	Percent above or below expected (100% is expected)
47	4848.94
19	5194.74
27	44.44
9	5766.67
106	622.64
55	52.73
240	4.58
317	37.54
42	3585.71
48	120.83
447	5.15
31	9.68
47	604.26
45	3088.89
137	8.03
193	73.06
67	91.04
67	8.22
162	4.94
27	96.3
348	12.64
196	38.78
28	4375
890	2391.12
18	1561.11
60	18.33
801	5.87
318	11.64
9	55.56
799	5.13
17	5229.41
2190	120.37
104	7.69
469	5.76
45	3035.56
441	60.77
35	3028.57
52	28.85
52	134.62
94	34.04
70	5.71
2211	291.32
47	87.23
270	7.41
420	6.9
9	1900
194	7.22
52	4913.46
57	5.26
26	15.38



## County JAN 1 Registration Ana

85	37.65
376	27.93
250	2561.2
681	9.25
65	260
3318	15.22
94	23.4
8	3950
257	54.47
151	3365.56
62	4.84
62	1608.06
2448	5.68
120	39.17
555	15.86
24	133.33
88	17.05
110	498.18
72	5.56
33	157.58
725	5.24
460	9.13
24	812.5
228	25.88
45	26.67
35	20
45	377.78
21	266.67
22	40.91
83	62.65
55	990.91
134	8.21
96	12.5
172	9.3
25	28
45	8.89
324	33.64
94	6.38
29	548.28
87	11.49
20	200
39	3592.31
64	9.38
16	456.25
87	3.45
22	4186.36
63	15.87
95	3.16
547	7.86
340	10.59
127	2470.87

## County JAN 1 Registration Ana

44	259.09
496	7.86
76	35.53
101	31.68
52	15.38
58	32.76
104	40.38
23	513.04
66	3.03
7	3428.57
54	16.67
18	1622.22
589	34.47
266	7.14
12	2891.67
40	147.5
24	108.33
197	8.12
76	6.58
12	6516.67
72	2350
18	777.78
5	280
50	126
22	27.27
25	24
27	11.11
126	16.67
104	9.62
68	27.94
45	142.22
17	4435.29
186	6.99
23	4756.52
25	8
85	217.65
75	48
185	3260
298	22.82
86	25.58
15	186.67
52	9.62
77	163.64
7	4400
13	2384.62
87	467.82
227	42.29
18	33.33
28	103.57
26	19.23
56	8.93

## County JAN 1 Registration Ana

Jan 1 Registrations	Voted	Other Dates Voted	Jan 1 Turnout Pct	Other Dates Turnout Pct
1994	4726		87.49	47.15
777	1476		78.72	38.33
10	3730		83.33	53.12
434	830		83.62	48.12
561	14446		85	53.72
20	7331		68.97	51.82
3	29500		27.27	47.31
89	39984		74.79	48.54
1284	3842		85.26	40.65
51	5979		87.93	47.77
7	54287		30.43	46.69
2	4822		66.67	59.29
226	5651		79.58	47.29
1172	4452		84.32	43.6
7	17047		63.64	47.85
98	23506		69.5	46.99
50	8444		81.97	48.91
6	9728		100	51.45
3	17953		37.5	42.55
21	3552		80.77	50.89
24	43797		54.55	48.49
52	24570		68.42	48.24
1020	2394		83.27	39.6
18382	88153		86.38	41.94
211	816		75.09	18.52
9	7732		81.82	49.82
19	120616		40.43	57.95
17	40377		45.95	48.8
5	1126		100	51.04
17	84262		41.46	40.56
695	1430		78.18	40.52
2297	309981		87.14	54.7
4	12621		50	46.71
16	64659		59.26	52.99
1190	4389		87.12	42.89
213	63632		79.48	55.61
914	3924		86.23	48.99
10	6333		66.67	46.93
55	5810		78.57	43.2
21	14015		65.63	57.36
2	8903		50	49.15
5145	293585		79.88	51.66
31	6624		75.61	54.58
16	26726		80	38.09
8	52976		27.59	48.51
134	931		78.36	44.27
6	25444		42.86	50.4
2114	5223		82.74	47.38
1	7583		33.33	50.84
3	3365		75	50.4

## County JAN 1 Registration Ana

21	12652	65.63	57.62
76	60343	72.38	61.78
5325	26838	83.16	45.85
35	102577	55.56	57.92
137	8615	81.07	51.84
331	419162	65.54	48.61
18	14119	81.82	57.71
274	1038	86.71	57.38
102	33236	72.86	49.84
4348	14609	85.56	42.85
1	8364	33.33	51.96
868	9666	87.06	64.42
54	299780	38.85	47.1
32	17010	68.09	54.51
57	73606	64.77	51.04
28	3377	87.5	54.89
7	11693	46.67	51.09
467	16600	85.22	59.18
2	10590	50	56.25
40	4437	76.92	52.08
20	95647	52.63	50.77
25	59259	59.52	49.53
179	3247	91.79	53.27
49	31932	83.05	53.96
11	6593	91.67	56.87
3	4552	42.86	50.15
135	6161	79.41	53.45
44	2736	78.57	50.89
6	3379	66.67	58.7
43	12259	82.69	57.29
470	7277	86.24	53.09
7	18567	63.64	53.18
6	13592	50	54.26
8	15439	50	34.61
5	3985	71.43	60.31
1	4424	25	37.85
90	34726	82.57	41.28
4	12785	66.67	52.41
125	3663	78.62	50.48
5	12601	50	55.58
35	2822	87.5	53.8
1142	4386	81.51	49.59
3	8945	50	53.56
67	2101	91.78	51.66
2	13764	66.67	60.72
802	2434	87.08	50.46
7	10356	70	63.53
2	11561	66.67	46.62
26	59466	60.47	41.8
22	42057	61.11	47.59
2805	19714	89.39	66.15

## County JAN 1 Registration Ana

103	6724	90.35	59.65
20	67129	51.28	52.09
19	10026	70.37	50.65
27	15047	84.38	57.17
2	7201	25	53.29
12	9442	63.16	62.42
29	13600	69.05	50.45
95	3281	80.51	55.39
1	10256	50	59.46
181	725	75.42	47.14
6	8290	66.67	59.14
248	2333	84.93	54.21
166	64098	81.77	41.94
12	34944	63.16	50.54
310	1573	89.34	57.45
50	5264	84.75	51.25
14	3043	53.85	48.19
6	24464	37.5	47.78
5	9391	100	47.34
581	974	74.3	42.31
1454	8003	85.93	46.81
124	2753	88.57	59.2
11	805	78.57	62.4
50	6490	79.37	50.6
6	3203	100	57.3
5	3420	83.33	52.32
1	3658	33.33	52.4
20	17308	95.24	52.74
8	13065	80	48.57
15	8490	78.95	48.39
52	7142	81.25	60.97
635	1821	84.22	49
8	23304	61.54	48.1
942	2170	86.11	44.34
1	3555	50	55.4
135	14227	72.97	65.09
23	10129	63.89	52.29
4680	17489	77.6	41.55
51	42510	75	54.93
14	10769	63.64	48.14
25	2137	89.29	53.6
3	7828	60	57.75
99	9938	78.57	50.27
268	860	87.01	58.31
257	1570	82.9	51.99
354	12369	86.98	55.7
79	27004	82.29	45.91
4	2625	66.67	54.96
25	4133	86.21	57.94
4	4061	80	59.04
3	7415	60	51.04

County JAN 1 Registration Ana

Overall Turnout Pct

54.62  
46.57  
53.17  
56.33  
54.47  
51.86  
47.31  
48.58  
46.78  
47.96  
46.69  
59.29  
48.04  
48.48  
47.86  
47.06  
49.03  
51.46  
42.55  
51  
48.5  
48.27  
46.95  
46.03  
21.91  
49.85  
57.95  
48.8  
51.15  
40.56  
48.1  
54.85  
46.71  
52.99  
48.1  
55.66  
53.34  
46.95  
43.38  
57.37  
49.15  
51.97  
54.65  
38.1  
48.51  
46.83  
50.4  
54.03  
50.84  
50.41



County JAN 1 Registration Ana

57.64  
61.79  
49.53  
57.92  
52.14  
48.62  
57.73  
61.74  
49.88  
48.39  
51.96  
65.83  
47.1  
54.53  
51.05  
55.06  
51.09  
59.68  
56.24  
52.23  
50.77  
49.53  
54.47  
53.99  
56.91  
50.14  
53.83  
51.18  
58.72  
57.35  
54.36  
53.18  
54.26  
34.62  
60.33  
37.85  
41.34  
52.42  
51.08  
55.57  
54.06  
53.96  
53.56  
52.37  
60.72  
56.33  
63.54  
46.63  
41.8  
47.59  
68.36

County JAN 1 Registration Ana

59.95  
52.09  
50.68  
57.2  
53.27  
62.42  
50.48  
55.88  
59.45  
50.96  
59.14  
56.16  
41.99  
50.54  
61.04  
51.44  
48.22  
47.77  
47.35  
50.42  
50.34  
60.06  
62.58  
50.74  
57.34  
52.35  
52.39  
52.76  
48.58  
48.43  
61.09  
54.94  
48.11  
51.97  
55.4  
65.16  
52.31  
46.07  
54.95  
48.16  
53.85  
57.75  
50.45  
63.26  
54.86  
56.26  
45.97  
54.98  
58.06  
59.06  
51.04

Cherokee County

county	Number Regis	Percent of To	Registered on Total	Register PCT of	Count Expected	regi
CHEROKEE	47	0.06	208126	208173	0.02	801

Cherokee County

Percent above Jan 1 Registrations Voted	Other Dates V Jan 1 Turnout Pct
5.87	19 120616 40.43

Cherokee County

Other Dates Turnout Pct	Overall Turnout Pct
57.95	57.95

Dekalb

county	Number Regis	Percent of To	Registered on Total	Register PCT of Count	Expected regi
DEKALB	6441	7.78	568346	574787	1.12 2211



Dekalb

Percent above Jan 1 Registr	Other Dates V	Jan 1 Turnout	Other Dates T	Overall Turnout Pct	
291.32	5145	293585	79.88	51.66	51.97